#### the Wolfsberg Group

Financial Institution Name: Location (Country) :

BANCO BILBAO VIZĆAYA ARGENTARIA S.A. SPAIN

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	BANCO BILBAO VIZCAYA ARGENTARIA S.A
2	Append a list of foreign branches which are covered by this questionnaire	London, Frankfurt, Brussels, New York, Taipei, Seoul, Paris, Hong Kong, Milán, Tokyo, Singapore, Portugal, Shangai.
3	Full Legal (Registered) Address	Plaza da San Nicolás, 4- , 48005 - Bilbao
4	Full Primary Business Address (if different from above)	Calle Azul, 4, 28050, Madrid
5	Date of Entity incorporation/establishment	Founded in 1857
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	BBVA:SM Madrid, Barcelona, Bilbao, Vatencia, London, Mexico, New York.
6 ៦	Member Owned/Mutua	No
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	
7	% of the Entity's total shares composed of bearer shares	0%
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Name of primary financial regulator/supervisory authority	BANCO DE ESPAÑA
11	Provide Legal Entity Identifier (LEI) if available	KBMS7F07N5Z2WQ51AZ71
	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	None

13	Jurisdiction of licensing authority and regulator of utimate parent	SPAIN
]	ultimale parent	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b	Private Banking	Yes
14 ¢	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	
14 i	Multilateral Development Bank	Yes
14 j		No
14 k	Wealth Management	Yes
19 K	Other (please explain)	
	1	
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	No <b>v</b>
	resident in a different jurisdiction to the location	
	where bank services are provided)	
15 a	If V provide the tax for a sure of the	
1019	If Y, provide the top five countries where the non-	
	resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	10001+
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above	
••	Section are representative of all the LE's branches.	No
<i>(</i> <b>1</b> .		
17 a	If N, clarify which questions the difference/s relate to	Please see annexes for all branches
	and the branch/es that this applies to.	
	J	
18	If appropriate, provide any additional	
	information/context to the answers in this section.	
<u> </u>		
	JCTS & SERVICES	
19	Does the Entity offer the following products and	
	services:	
19 a	Correspondent Banking	Yes
19 a1	IFY	
19 ata	Does the Entity offer Correspondent Banking	
	services to domestic banks?	Yes
19 a1b	Does the Entity allow domestic bank clients to	
		Yes
19 210	provide downstream relationships?	Yes
19 a1c	provide downstream relationships? Does the Entity have processes and procedures	
19 a1c	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with	Yes
	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	
19 a1c 19 a1d	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking	Yes
19 a1d	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks?	
	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships	Yes
19 a1d	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks?	Yes
19 a1d	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks?	Yes
19 a1d 19 a1e	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures	Yes Yes
19 a1d 19 a1e	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks?	Yes
19 a1d	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Yes Yes
19 a1d 19 a1e	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking	Yes Yes Yes
19 a1d	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	Yes Yes
19 a1d 19 æ1e 19 a1f 19 a1g	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	Yes Yes Yes
19 a1d	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Monay Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity aflow downstream relationships	Yes Yes Yes
19 a1d 19 a1e 19 a1f 19 a1g	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	Yes Yes Yes
19 a1d 19 a1e 19 a1f 19 a1g	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Monay Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity aflow downstream relationships	Yes Yes Yes
19 a1d 19 ø1e 19 a1f 19 a1g 19 a1g	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity tave processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Monay Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity aflow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	Yes           Yes           Yes           Yes           Yes
19 a1d 19 a1e 19 a1f 19 a1g 19 a1h 9 a1h1	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Monay Services Businesses (MSBs)Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? MSBs	Yes Yes Yes Yes No
19 a1d 19 ø1e 19 a1f 19 a1g 19 a1g	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity tave processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Monay Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity aflow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	Yes           Yes           Yes           Yes           Yes

19 a1i	Does the Entity have processes and procedures in place to Identify downstream relationships with MSBs /MVTSs/PSPs?	Yes
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	Yes
19 f	International Cash Letter	Yes
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
191	Payment services to non-bank entities who may	
	then offer third party payment services to their customers?	Yes
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	Yes
19 i3	Virtual Asset Service Providers (VASPs)	Yes
19 i4	eCommerce Platforms	Yes
19 15	Other - Please explain	
19 j	Private Banking	Both
19 k	Remote Deposit Capture (RDC)	No
191	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	Yes
19 n	Trade Finance	Yes
19 0	Virtual Assets	No
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	Yes
19 p1a	If yes, state the applicable level of due diligence	dentification and verification
19 p2	Wire transfers	Yes
19 p2a	If yes, state the applicable level of due diligence	Identification and vertification
19 p3	Foreign currency conversion	Yes
19 p3a	If yes, state the applicable level of due diligence	Identification and verification
19 p4	Sale of Monetary Instruments	Yes
19 p4a	If yes, state the applicable level of due diligence	Identification and verification
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	BBVA accepts non account customers, as it acts as receiver for Tax and Social Security and other Spanish authorities, and clients can walk in and pay their duties. BBVA has no appetite for other type of walk-in customers. In the mentioned cases, the bank duly identifies the customers according to Spanish and European best practices.
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.	No
20 20 a		No Please see annexes for all branches
20 a 21	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	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 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. <b>IF 8, SANCTIONS PROGRAMME</b> Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	Please see annexes for all branches
20 a 21 3. AML, C 22 22 a	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. IFF & 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	Please see annexes for all branches
20 a 21 3. AML, C 22 22 a 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. <b>IF &amp; SANCTIONS PROGRAMME</b> 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	Please see annexes for all branches 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 & 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	Please see annexes for all branches
20 a 21 3. AML, C 22 22 a 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. <b>IF &amp; SANCTIONS PROGRAMME</b> 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	Please see annexes for all branches 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 & 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	Please see annexes for all branches Yes Yes Yes Yes Yes
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 c 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 & 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	Please see annexes for all branches Yes Yes Yes Yes Yes Yes
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 c 22 c 22 c 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. <b>IF &amp; SANCTIONS PROGRAMME</b> 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	Please see annexes for all branches Yes Yes Yes Yes Yes Yes Yes Yes Yes
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 c 22 c 22 c 22 c 22 c 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 & 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	Please see annexes for all branches  Yes Yes Yes Yes Yes Yes Yes Yes Yes
20 a 21 3. AML, C 22 22 a 22 b 22 c 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. <b>TF &amp; SANCTIONS PROGRAMME</b> 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 EDD	Please see annexes for all branches  Yes Yes Yes Yes Yes Yes Yes Yes Yes
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 c	Section are representative of all the LE's branchas. 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 <b>8</b> , <b>SANCTIONS PROGRAMME</b> 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	Please see annexes for all branches  Please see annexes for all branches  Yes Yes Yes Yes Yes Yes Yes Yes Yes
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 c	Section are representative of all the LE's branchas. 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 <b>8</b> , 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 EDD Heependent Testing Periodic Review Policies and Procedures	Please see annexes for all branches  Please see annexes for all branches  Yes Yes Yes Yes Yes Yes Yes Yes Yes

22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 0	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	101-500
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 Quastion 29.	No
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?	Yes
26 a	If Y, provide further details	Only one company 100% owned by the group, for back office and administrative tasks
27	Does the entity have a whistleblower policy?	
28	Confirm that all responses provided in the above	Yes
28 a	Section are representative of all the LE's branches	No
20 4	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Please see annexes for all branches
29	If appropriate, provide any additional information/context to the answers in this section.	Clarification #24: It is composed of several policles reviewed on an ongoing basis. Not necessarily every year, but some with a higher frequency. Approved at the level required by internal governance
4. ANT	I BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that;	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
18	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
8 a	If N, provide the date when the last ABC EWRA was completed.	
9	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
10	Does the Entity's ABC EWRA cover the inherent risk components detailed below;	Yes
0 a	Potential liability created by intermediaries and	

40 b		
40 15	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	Y85
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	Yes
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Yea
42 f	Non-employed workers as appropriate (contractors/consultants)	Yes
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	Regarding question 42F, It should be noted that BBVA does not provide training to all non employed workers but it does provide training to certain high risk non-employed workers such as agents. BBVA requires all its third parties to certify their commitment to comply with all applicable anticorruption laws.
5. AML, C	<b>IF &amp; SANCTIONS POLICIES &amp; PROCEDURES</b>	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	· · · · · · · · · · · · · · · · · · ·
	consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report:	
<b>46</b> a	consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering	Yes
46 a 46 b	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing	Yes
46 a 46 b 46 c	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations	
46 a 46 b 46 c 47	consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually?	Yes
46 a 46 b 46 c 47 48	consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against:	Yes Yes
46 a 46 b 46 c 47 48 48	consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards	Yes Yes Yes Yes Yes
46 a 46 b 46 c 47 48 48 48 a 48 a	consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes No
46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a	consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards	Yes Yes Yes No Yes
46 a 46 b 46 c 47 48 48 48 a 48 a 48 a 48 b 48 b	consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes No
46 a 46 b 46 c 47 48 48 48 a 48 a 48 a 48 b 48 b 48 b 49	consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that:	Yes Yes Yes No Yes
46 a 46 b 46 c 47 48 48 48 a 48 a 48 a 48 a 48 b 48 b 49 a	consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes Yes Yes No Yes
46 a 46 b 46 c 47 48 48 48 a 48 a 48 a 48 b 48 b 48 b 49	consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and ficilious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes Yes Yes No Yes Yes Yes
46 a 46 b 46 c 47 48 48 48 a 48 a 48 a 48 a 48 b 48 b 49 a	consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes Yes Yes Yes No Yes Yes Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 48 b 49 b 49 b	consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes         Yes
46 a 46 b 46 c 47 48 48 48 a 48 a 48 b 48 b 48 b 49 b 49 a 49 c	consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBF is	Yes Yes Yes Yes No Yes Yes Yes Yes Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b 48 b 49 b 49 a 49 c 49 d	consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks	Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 49 49 a 49 a 49 c 49 c 49 d 49 e	consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and ficilitous named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entities that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unficensed/unregulated remitance agents,	Yes         Yes           Yes         Yes

491	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, Including foreign branches and affiliates	Yes
491	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	
		5 years or more
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
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.	clarification #48 a): BBVA Sanctions policies comply with OFAC regulations. Other AML policies are not gapped against US standards necessarily.
6 ABB C3	IF & SANCTIONS RISK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 a	Client	Yes
54 b	Product	Yes
54 c	Channel	Yes
54 d	Geography	Yes
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
55 a	Transaction Monitoring	Yes
55 b	Customer Due Diligence	Yes
55 c 55 d	PEP Identification Transaction Screening	Yes
55 e	Name Screening against Adverse Media/Negative News	Yes Yes
55 /	Training and Education	Yes
55 g	Governance	Yas
55 h	Management Information	Yes
56	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
56 a	If N, provide the date when the last AML & CTF EWRA was completed,	
57	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	in a constant of the state of t
57 a	Client	Yes
57 b	Product	Yes
57 ¢	Channei	Yes
57 d	Geography	Yes
58	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below;	
58 a	Customer Due Diligence	Yes
58 b		
EQ 4	Governance	Yes
58 c 56 d	Governance List Management Management Information	Yes Yes

58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
56 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in	Yes
	the last 12 months?	
59 a	If N, provide the date when the last Sanctions	
	EWRA was completed.	
ļ		ļ.
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	
000	and the branch/es that this applies to.	
	and the warming matches appression	
. <del>.</del>		
61	If appropriate, provide any additional	
	Information/context to the answers in this section.	
7. KYC. (	CDD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Enlity's policies and procedures set out when	
	CDD must be completed, e.g. at the time of	Yes
	onboarding or within 30 days?	163
64	Which of the following does the Entity gather and	
57	retain when conducting CDD? Select all that apply;	
64.0	Customer identification	
64 a		Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	No
66	What is the Entity's minimum (lowest) threshold	
	applied to beneficial ownership identification?	25%
67	Does the due diligence process result in customers	
07	receiving a risk classification?	Yas
£7 a	If Y, what factors/criter/e are used to determine the	
67 a	• · · · · · · · · · · · · · · · · · · ·	
ATT - 1	customer's dsk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Enlity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	Lenghl of the relationship and AMI, screenings
		rengnt of the relationship alto Awar, screetlings
	1	
	1	
68	For high risk non-individual customers, is a site visit a	
	part of your KYC process?	Yes
68 a	If Y, is this at:	
68 a 1	Onboarding	
68 a2	KYC renewal	Yes
68 a2 68 a3		Yes
	Trigger event	Yes
68 84	Other	Yes
68 a4a	If yes, please specify "Other"	irregular operations
69	Does the Entity have a risk based approach to	
	screening customers for Adverse Media/Negative	Yes
	News?	
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	
		Yes

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	
71	Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screenin, oustomers and connected parties to determine whethe they are PEPs, or controlled by PEPs?	g r Yes
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a 👘	If yes, select all that apply:	
74 a1	Less than one year	No
74 a2	1 – 2 years	Yes
74 a3	3 - 4 years	Yes
74 24	5 years or more	Yes
74 a5 74 a6	Trigger-based or perpetual monitoring reviews	Yes
	Other (Please specify)	
75	Does the Enlity maintain and report matrics on current and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or Industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	EDD on risk-based approach
76 b	Respondent Banks	EDD on risk-based approach
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	No EDD/restriction or prohibition
76 d	Extractive industries	No EOD/restriction or prohibition
76 e	Gambling customers	EDD on risk-based approach
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	No EDD/restriction or prohibition
	MSB/MVTS customers	EDD on risk-based approach
76 í	Non-account customers	No EDD/restriction or prohibition
76)	Non-Government Organîsations	
76 k	Non-resident customers	No EDD/restriction or prohibition
761		No EDD/restriction or prohibition
	Nuclear power	No EDD/restriction or prohibilion
76 m	Payment Service Providers	EDD on risk-based approach
76 n	PEPs	EDD on risk-based approach
76 0	PEP Close Associates	EDD on risk-based approach
76 p	PEP Refated	EDD on risk-based approach
76 q	Precious metals and stones	No EDD/restriction or prohibition
76 r	Red light businesses/Adult entertainment	No EDD/restriction or prohibilion
76 s	Regulated charities	No EDD/restriction or prohibition
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	No EDD/restriction or prohibition
76 v	Unregulated charities	No EDD/restriction or prohibition
76 w	Used Car Dealers	No EDD/restriction or prohibition
76 x	Virtual Asset Service Providers	EDD on risk-based approach
76 y	Olher (specify)	MVTS/MSB customers are restricted and need authorization to be clients
7	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	Yes

78 a	If Vindicate who provides the expressel:	D.4	
	If Y indicate who provides the approval:	Both	
79	Does the Entity have specific procedures for		
	onboarding entities that handle client money such as	Yes	
	lawyers, accountants, consultants, real estate agents?		
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		
a 1	Section are representative of all the LE's branches	No	
	-		
81 a	If N, clarify which questions the difference/s relate to	See annexes for Belgium, Germany, Hong Kong, London, Milan, Paris, Singapora and Taiwan	
	and the branch/es that this applies to	branches.	
1			
82	If appropriate, provide any additional	#65c: Key controllers are identified when they coincide with the Spanish law concept of beneficial	
	information/context to the answers in this section.	owners (over 25%),	
	ĺ		
0 MONITO	DRING & REPORTING		
6. (NOIVITC		- · · · · · · · · · · · · · · · · · · ·	
83	Does the Entity have risk based policies, procedures		
	and monitoring processes for the identification and	Yes	
	reporting of suspicious activity?		
84	What is the method used by the Entity to monitor		
<b>1</b>	Iransactions for suspicious activities?	Automated	
84 a	If manual or combination selected, specify what		
	type of transactions are monitored manually		
	If automated or combination selected, are internal	Vendor-sourced tools	
84 b	system or vendor-sourced tools used?		
0464	Kit fan den en waard in alt en Diatiel ander de die die d		
84 b1	If Vendor-sourced tool' or 'Both' selected, what is	SAS AML	
	the name of the vendor/tool?		
04 1-0	Nipop was the to all last us date d?		
84 b2	When was the tool last updated?	< 1 year	
4460	When was the outernal of Transceller Menitering		
84 b3	When was the automated Transaction Monitoring application last collibrated?	< 1 year	
	application last calibrated?		
0.E	Does the Entity have regulatory requirements to		
85	report suspicious transactions?	Yes	
	If X does the Estitution collision preseduate and		
85 a	If Y, does the Entity have policies, procedures and	N	
	processes to comply with suspicious transaction	Yes	
	reporting requirements?		
86	Does the Entity have policies, procedures and		
	processes to review and escalate matters arising from	Yes	
	the monitoring of customer transactions and activity?		
87	Does the Entity have a data quality management		
	programme to ensure that complete data for all	Yes	
	transactions are subject to monitoring?		
	Does the Entity have processes in place to respond		
	to Request For Information (RFIs) from other entities	Yes	
	in a timely manner?		
	Does the Entity have processes in place to send		
	Requests for Information (RFIs) to their customers in	Yes	
	a limely manner?		
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	See annexes for branches	
	and are branchines that ons applies to		
91	If appropriate, provide any additional		
	information/context to the answers in this section.		
1			
9. PAYMEN	P. PAYMENT TRANSPARENCY		
	Does the Enlity adhere to the Wolfsberg Group		
	Payment Transparency Standards?	Yes	
	- J		

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	EU Regulation 847/2015
93 c	lí N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yeş
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	See annexes for branches
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SAN	CTIONS	
96	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (Including prohibitions within the other entity's local jurisdiction)?	No
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?	Yaş
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 senctions screening?	Automated
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Both
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	FIRCOSOFT
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Automaled

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners (i.e. reference data)
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners (i.e. reference data)
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners (i.e. reference data)
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners (i.e. reference data)
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners (i.e. reference data)
106 f	Other (specify)	BBVA adheres to local AML screening requirements in the jurisdictions where it has presence.
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	Yeş
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Please, see annexes for branches.
110	If appropriate, provide any additional information/context to the answers in this section.	#99 We have procedures to avoid prohibitions within jurisdictions where we have presence and from EU, UN, and OFAC, but cannot prevent local prohibitions in the rest of jurisdictions where our correspondent banks are established. #108: Repr office in Cuba with no banking activity, only institutional relations.
11. TRAINI	NG& EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 ə	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 <i>t</i>	Fraud	Yes
112	Is the above mandatory training provided to:	
112 a	Board and Sentor Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c 112 d	2nd Line of Defence 3rd Line of Defence	Yes
1120 112e	Third parties to which specific FCC activities have	Yes
	been outsourced	Yes
112 [	Non-employed workers (contractors/consultants)	Yes
113	Does the Enlity provide AML, CTF & Sanctions training that is largeted to specific roles, responsibilities and high-risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes

and the branktins Rut His applies to.       116     Happropiate, provide any additional information/boniest to the answers in this section.       12. CUALITY ASSUMANCE COOPLIANCE TESTING Coopling Assuming approximation for familia testing (departed from the independent Add tuncton?)       12. CUALITY ASSUMANCE COOPLIANCE TESTING Coopling to the provide any additional coopling to the provide any additional coopling to the provide any additional information/boniest to the provide any additional file and the provide any additional information testing provide any additional information to the provide any additional information the answers in this audion.       12. Control Testing provide any additional information to the provide any additional information testing provide any additional informatesting provide any additional information testing provid			
Information (context to the answers in this section,       17. GOALTY ASSURANCE (COMPLIANCE TESTING       17. Obes the Entity have a program wide risk based       Call Assurance (comparise of frain-bit three (Apparial from the Independent Add Mucleon)?       18. Obes the Entity have a program wide risk based       Compliance Testing process (contain from the Dependent Add Mucleon)?       19. Optimize Testing process (contain from the Dependent Add Mucleon)?       19. Optimize Testing process (contain from the Dependent Add Mucleon)?       19. Optimize Testing process (contain from the Dependent Add Mucleon)?       19. Optimize Testing process (contain from the Dependent Add Mucleon)?       19. Optimize Testing the Contain from the Dependent Add Mucleon)?       19. Optimize Testing the Contain from the Dependent Add Mucleon)?       19. Optimize Testing the Contain from the Dependent Add Mucleon?       19. Addition to Inspectation to the Bond Mucleon addition ad Information addition ad Social Testing function are dependent Add Mucleon?       19. Addition to Inspectation of the Add Mucleon?       19. Desting the Editory addition ad Information addition ad Social Testing function are dependent Add Mucleon?       19. Desting the Editory addition ad Social Testing function are dependent Add Mucleon?       19. Desting the Idea Mucleon?       19. Desting the Editory addition ad Information addition ad	115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
Information (context to the answers in this section,       17. GOALTY ASSURANCE (COMPLIANCE TESTING       17. Obes the Entity have a program wide risk based       Call Assurance (comparise of frain-bit three (Apparial from the Independent Add Mucleon)?       18. Obes the Entity have a program wide risk based       Compliance Testing process (contain from the Dependent Add Mucleon)?       19. Optimize Testing process (contain from the Dependent Add Mucleon)?       19. Optimize Testing process (contain from the Dependent Add Mucleon)?       19. Optimize Testing process (contain from the Dependent Add Mucleon)?       19. Optimize Testing process (contain from the Dependent Add Mucleon)?       19. Optimize Testing the Contain from the Dependent Add Mucleon)?       19. Optimize Testing the Contain from the Dependent Add Mucleon)?       19. Optimize Testing the Contain from the Dependent Add Mucleon?       19. Addition to Inspectation to the Bond Mucleon addition ad Information addition ad Social Testing function are dependent Add Mucleon?       19. Addition to Inspectation of the Add Mucleon?       19. Desting the Editory addition ad Information addition ad Social Testing function are dependent Add Mucleon?       19. Desting the Editory addition ad Social Testing function are dependent Add Mucleon?       19. Desting the Idea Mucleon?       19. Desting the Editory addition ad Information addition ad			
117     Does the Endy have a program wider nic based (daptarea from the independent Auft function)?     Yes       118     Does the Sinthy have a program wider in blanded (conpliance Testing process (expande from the independent Auft function)?     Yes       119     Candim That all responses provided in the above Bacchar and presentations the differences relate to and the transformation of the LEB barnchines     Yes       119     If appropriate, provide any additional information of the UEB barnchines     Yes       120     If appropriate, provide any additional information of the CB barnchines and the transformation process on a registra barlow in this section.     Yes       121     If appropriate, provide any additional information barlow barlow in this section.     Yes       122     If appropriate, provide any additional information barlow barlow information and the transformation process on a registra barlow information and process on a registra barlow information barlow on the information and barlow information process on a registra barlow information and barlow information process on a registra barlow information and barlow information process on a registra barlow information and the independent inford process on a registra barlow information and information process on a registra barlow information process on a registra barlow information and barlow information process on a registra barlow information and barlow information process on a registra barlow information process on a registra barlow information process on a regis	116		
117     Does the Emily have a program wide risk based (daptarak from the independent Aufk function)?     Yes       118     Does the Strity have a program wide risk based Compliance Testing process (separate from the independent Aufk function)?     Yes       119     Cantim that all responses provided in the above Bacchar expresentation of the LEDs branches and the branches that this applice to and the branches that this applice to minimize the transmission of the LEDs branches and the branches that this applice to minimize the transmission of the transmission of the transmission of the transmission and the branches that this applice to minimize the transmission of the transmission of transmission of transmission of the transmission of transmission of transmission of the transmission of transmission of transmission of transmission of transmission of transmission of transmission of	12 OUAL		
Catality Assuring programme for financial crime (separate form the independent Audit function)?         Yes           118         Does the Entity have a program wide risk based Complement Testing programs wide risk based Complement Testing programs with the above Section are representative of all the LS branches         Yes           118         Confirm Thical responses provided in the based and the branches but this applies to.         Yes           120         If appropriate, provide any additional information to the answers in this acation.         Yes           121         If addition to Inspections by the government supervisor resputations, does the Entity have a section and information addition to charge the following.         Yes           122         If addition to Inspections by the government supervisor resputations, does the Entity have addition and information addition to charge the following.         Yes           122         If addition to Inspections by the Government supervisor resputations do assisted on the AML CTF, AGC, Fraud and Sanchore policies and prodices on a regider basis?         Yes           122         How of the indegendent indegendent the following areas: 123         Comparento based environs         Yes           124         How of the indegendent indegendent the following areas: 125         Comparento based environs         Yes           125         External Titled Party         Yes         Yes         Yes           125         External Titled Party         Yes         Y			
Compliance Testing process (coprove term the Indigenetian Addit Disciple Constraints)     Yes       119     Candim That diff responses provided in the above section are representative of all the LES banches is and the branchies that this applies to.     Yes       120     If Appropriate, provide any stabilizerial information/context to the answers in this section.     Yes       120     If appropriate, provide any stabilizerial information/context to the answers in this section.     Yes       121     In addition to inspections by the government integendent thig party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sancheron patients and produces on a regular basis?     Yes       122     How one in the Endry assisted on the AML CTF, ABC, Fraud and Sancheron patient and and Congent patients and produces on a regular basis?     Yes       122     How one in the Endry assisted on the AML CTF, ABC, Fraud and Sancheron patient patients and Sancheron patient procedures     Yes       122     External Third Party     Component based reviews       123.1     External Third Party     Yes       124     If the patient function or other indegendent procedures     Yes       123.1     External Third Party     Yes       123.2     March Scancheron Patient Party     Yes       123.1     External Third Party     Yes       123.2     March Scancheron Patient Party     Yes       124     March Scancheron Party     Yes       125.1		Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes
Section are representative of all the LEb branches         Yes           119 a         If, claffy which oursins the difference relate to and the branches that this applies to.         If           120         If appropriate, provide any idditional information/context to the answers in this accion.         If           13, AUDIT         If addition to impections by the government independent thic party or both, that assess FCC AML, CTF, ABC, Fraud and Sancharo publics and practices on a regular to robal relative and practices on a regular to robal relative and practices on a regular to robal relative and practices on a regular to robal relative and and Exclore programme by the following:         Yes           122         How often is the Eritity sudiked on its AML, CTF, ABC, Fraud and Exclore programme by the following:         Yes           123         External Third Party         Consense the second practices on a regular to addit function or other independent third badry cover the following eness:         Yes           124         Finder and Sanching publics         Yes           125         External Third Party         Consense the second practices on a regular tand and Sanching publics           126         External Sanching public following eness:         Yes           127         Date to addit function or other independent third party cover the following eness:         Yes           128         Governance         Yes         Sanching function for addit function Yes           129         Fin		Compliance Testing process (separate from the	Yes
and the branchies that this applies to,     Importants, provide any additional information/context to the answers in this section.       120     If appropriate, provide any additional information to the section.       13. AUDIT     Importants, provide any additional information to the section.       13. AUDIT     Importants, provide any additional information to the section.       13. AUDIT     Importants, class the Entry have an information to the section.       14. MURIT     Importants, class the Entry have an information to the section.       121     Importants, provide any addition to the AUL CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?       122     Internal Audit Department       122     Component-based regions       122     External Third Party.       123     Component-based regions       124     Max, CTF, ABC, Fraud and Sanctions policy and practices policy and the independent in the party cound a policy access:       123     Commance       124     AML, CTF, ABC, Fraud and Sanctions policy and traits.       125     Extensing & List Management Mornation       126     Commance & the mark mornation to the independent information.       127     Discretaria & the magement Mornation       128     Extension Mode Risk Assessment.     Yes       129     Commance & the magement Mornation Yes       129     Commance & the magement Mornation Yes       129<		Section are representative of all the LE's branches	Yes
Information/context to the answers in this section,         13. AUDIT         13. AUDIT         13. AUDIT         13. AUDIT         14. In addition to inspections by the government interpolators, does the Enthy have an indema such threchon or above or and precises on a regular beals?         12. How offen is the Enthy addited on is AML, CTF, ABC, Fraud and Sanctions polycites and precises on a regular beals?         12. How offen is the Enthy addited on is AML, CTF, ABC, Fraud and Sanctions programme by the following:         12. Descent and Audit Despatient.         12. Descent and Audit Despatient.         12. Descent and Audit Despatient.         12. Descent and and Sanctions poly and process:         12. Descent and and Sanctions poly and process:         12. Descenting & List Management.         12. Technology:         12. Reparting Metrics & Management.         12. Technology:         12. Technology:         13. Technology:         14. Reparting Metrics & Management Information.       Yes         12. Technology:       Yes	t19 a		
121       In addition to large-close by the government informal such 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 suchted on its AML, CTF, ABC, Fraud and Sanctions pogramme by the following:       Compenent-based reviews         122.8       Liternal Audit Dopatities and practices on a regular basis?       Compenent-based reviews         123.0       External Third Party third party over the following areas:       Compenent-based reviews         123.0       External Third Party third party over the following areas:       Yes         123.0       Enterprise Wide Risk Assessment third party over the following methodiciges ves       Yes         123.0       Enterprise Wide Risk Assessment third party over the following methodiciges ves       Yes         123.0       Enterprise Wide Risk Assessment third party over the following methodiciges ves       Yes         123.1       Reporting/Metrica & Management Information type       Yes         123.1       Ternascion Monitoring ves       Yes         123.1       Ternascion Monitoring ves       Yes         123.1       Compensity assessed for adequey and completiones?       Yes         124       Are adveste findings from internal & external audit ves declose are representative of all the LEb baranches ves       Yes	120		
121       In addition to inspections by the government informal audit function, a testing function or other Independent third party, orboth, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and prodices on a regular basis?       Yes         122       How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:       Component-based reviews         122.4       Internal Audit Dopartment       Component-based reviews         123.0       External Third Party       Yes         123.1       External Third Party       Yes         123.6       Enternal audit function or other independent third party over the following areas:       Yes         123.6       Enternal audit function or other independent third party over the following areas:       Yes         123.6       Enternal audit Combine or other independent third party over the following areas:       Yes         123.6       Enternal audit Combine or other independent third party over the following areas:       Yes         123.6       Enternal south Combine policy and two sciences       Yes         123.6       Transaction Monitring       Yes         123.1 </td <td>13. AUDIT</td> <td>·</td> <td>I</td>	13. AUDIT	·	I
Fraud and Sanctione programme by the following:     Internal Audit Department     Compenent-based reviews       122 b     External Third Party     Yeally       123 b     External Third Party     Yeally       123 b     Does the internal audit function or other independent third party cover the following areas:     Yeal       123 b     Enterprise Wide Risk Assessment     Yea       123 c     Governance     Yea       123 d     KYCkDDR/ED and underlying methodologies     Yea       123 d     Name Screening & List Management information     Yea       123 g     Suspicious Activity Filing     Yea       123 h     Technology     Yea       123 h     Technology     Yea       123 h     Technology     Yea       123 h     Transaction Monitoring     Yea       123 h     Transaction Monitoring for sanctions     Yea       123 h     Transaction Monitoring     Yea       123 h     Comm that all responses provided in the above section are representative of all the LE's branches     Yea       124 h     Iv Agersonase provide any additional information/conlexit to the answers in this section.     Yea       125 a     If N, clarify which questions the difference's relate to and the branches that this applies to.     Yea       125 a     If N papropriate, provide any additional information/conlexit to the answ		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 bolh, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and	Yes
122 b     External Third Party     Yeal       123     Does the internal audit function or other independent third party over the following areas:     1       123 a     AML, CTF, ABC, Fraud and Sanctions policy and procedures     Yes       123 b     Enterprise Wide Risk Assessment     Yes       123 c     Governance     Yes       123 d     KYCiCDD/EDD and underlying methodologies     Yes       123 d     KYCiCDD/EDD and underlying methodologies     Yes       123 d     Name Screening & List Management     Yes       123 f     Reporting/Metrics & Management Information     Yes       123 g     Suspicious Activity Filing     Yes       123 h     Technology     Yes       123 h     Transaction Screening including for sanctons     Yes       123 h     Confirm that all responses provided in the above seelion are representative of all the above seelion are representative of all the above seelion are representative of all the LE's branches     Yes       125 a     If Appropriate, provide any additional information/conlexi to the answers in this section.     Yes       125 a     If appro	122		
123     Does the internal audit function or other independent third party cover the following areas:       123 a     AML CTF, ABC, Fraud and Sanctions polloy and procedures       123 b     Enterprise Wide Risk Assessment     Yes       123 c     Governance     Yes       123 d     KYC/CD0/EDD and underlying methodologies     Yes       123 d     KYC/CD0/EDD and underlying methodologies     Yes       123 d     Name Screening & List Management     Yes       123 d     Name Screening & List Management Information     Yes       123 d     Suspicious Activity Filing     Yes       123 h     Technology     Yes       123 t     Transaction Screening including for sanctions     Yes       124 Are adverse findings from internal & external audit tracked to completion and assessed for adequecy and completenees?     Yes       125 Confirm that all responses provided in the above section are representative of all the LEs branches     Yes       125 a     If Appropriate, provide any additional information/context to the answers in this section.     Yes       126     <			Compenent-based reviews
bird party cover the following areas:       123 a     AML_CTF, ABC, Fraud and Sanctions policy and procedures     Yes       123 b     Enterprise Wide Risk Assessment     Yes       123 c     Governance     Yes       123 d     KYC/CDD/EDD and underlying methodologies     Yes       123 d     KYC/CDD/EDD and underlying methodologies     Yes       123 d     Name Screening & List Management     Yes       123 d     Name Screening & List Management     Yes       123 g     Suspicious Activity Filing     Yes       123 f     Reporting/Metrics & Management Information     Yes       123 f     Trennaction Monitoring     Yes       123 f     Trennaction Monitoring     Yes       123 f     Transaction Screening including for sanctions     Yes       123 f     Transaction Monitoring     Yes       123 f     Transaction Monitoring     Yes       123 f     Transaction Monitoring     Yes       123 f     Coher (specify)     Yes       124     Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completenees?     Yes       125 a     If N, clarify which questions the difference/s relate to and the branch/es that this applies to.     Yes       125 a     If appropriate, provide any additional information/context to the answers in this sec			Yeariy
procedures     Yes       123 b     Enterprise Wide Risk Assessment     Yes       123 c     Governance     Yes       123 d     KYC/CDD/EDD and underlying methodologies     Yes       123 d     KYC/CDD/EDD and underlying methodologies     Yes       123 d     Reporting & List Management     Yes       123 d     Reporting Methodologies     Yes       123 d     Reporting Methods & Management Information     Yes       123 f     Reporting Methods & Management Information     Yes       123 f     Technology     Yes       123 f     Technology     Yes       123 f     Technology     Yes       123 f     Transaction Monitoring     Yes       123 f     Transaction Screening including for sanctions     Yes       123 f     Transaction Screening including for sanctions     Yes       123 f     Transaction Monitoring     Yes       123 f     Other (specify)     Yes       124 tracked to completion and assessed for adequecy and completioness?     Yes       125 confirm that all responses provided in the above socion are representative of lift be Etis branches     Yes       126 If Appropriate, provide any additional information (context to the answers in this section.     Yes       126 If Appropriate, provide any additional information/context to the answers in this section		third party cover the following areas:	
123 c     Governance     Yes       123 d     KYCKCDD/ED and underlying methodologies     Yes       123 e     Name Screening & List Management     Yes       123 f     Reporting/Metrics & Management information     Yes       123 g     Suspicous Activity Filing     Yes       123 h     Technology     Yes       123 h     Technology     Yes       123 h     Transaction Monitoring     Yes       123 h     Transaction Screening including for sanctons     Yes       123 k     Transaction Screening including for sanctons     Yes       123 k     Training & Education     Yes       123 k     Training & Education     Yes       123 k     Training & Education     Yes       124 hre adverse findings from Internal & external audit wacked to completion and assessed for adequecy and completeness?     Yes       125 Confirm that all responses provided in the above section are representative of all the LE's branches     Yes       125 a     If N, clarify which questions the difference's relate to and the branch/se that this applies to.     Yes       126 W appropriate, provide any additional information/context to the answers in this section.     Yes       127     Does the Entity have policies in place addressing fraud risk?     Yes       128     Does the Entity have policies in place addressing fraud risk?     Yes <td></td> <td>procedures</td> <td>Yes</td>		procedures	Yes
123 d     KYC/CDD/EDD and underlying methodologies     Yes       123 e     Name Screening & List Management Information     Yes       123 f     Reporting/Metrics & Management Information     Yes       123 g     Suspicious Activity Filing     Yes       123 h     Technology     Yes       123 h     Technology     Yes       123 h     Technology     Yes       123 i     Transaction Monitoring     Yes       123 i     Transaction Screening including for sanctions     Yes       123 k     Training & Education     Yes       123 l     Other (specify)     Yes       124     Are adverse findings from Internal & external audit tracked to completion and assessed for adequecy and completeness?     Yes       125     Confirm that all responses provided in the above section are representative of all the LE's branches     Yes       125 a     If N, clarify which questions the difference/s relate to and the branch/se that this applies to.     Yes       126     If appropriate, provide any additional information/context to the answers in this section, fraud tisk?     Yes       127     Does the Entity have policies in place addressing fraud tisk?     Yes       128     Does the Entity have a dedicated team responsible     Yes			
123 e     Name Screening & List Management     Yes       123 f     Reporting/Metrics & Management Information     Yes       123 g     Suspicious Activity Filing     Yes       123 h     Technology     Yes       123 I     Transaction Monitoring     Yes       123 I     Transaction Screening including for sanctions     Yes       123 I     Transaction Screening including for sanctions     Yes       123 I     Transaction Screening including for sanctions     Yes       123 I     Training & Education     Yes       123 I     Other (specify)     Yes       124     Are adverse lindings from Internal & external audit tracked to completion and assessed for adequacy and completeness?     Yes       125     Confirm that all responses provided in the above section are representative of all the LE's branches     Yes       125 a     If N, clarify which questions the difference/s relate to and the branch/es that this applies to.     Yes       126     If appropriate, provide any additional information/context to the answers in this section.     Yes       127     Does the Entity have policies in place addressing faud tisk?     Yes       128     Does the Entity have a dedicated team responsible     Yes			
123 f     Reporting/Metrics & Management Information     Yes       123 g     Suspicious Activity Filing     Yes       123 h     Technology     Yes       123 I     Transaction Monitoring     Yes       123 I     Transaction Screening including for sanctions     Yes       123 I     Transaction Screening including for sanctions     Yes       123 I     Transaction Screening including for sanctions     Yes       123 I     Other (specify)     Yes       124     Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?     Yes       125     Confirm that all responses provided in the above section are representative of all the LE's branches     Yes       125 a     If N, clarify which questions the difference/s relate to and the branch/es that this applies to.     Yes       126     If appropriate, provide any additional information/context to the answers in this section.     Yes       127     Does the Entity have policies in place addressing fraud risk?     Yes       128     Does the Entity have a dedicated team responsible     Yes			
123 g     Suspicious Activity Filing     Yes       123 h     Technology     Yes       123 i     Transaction Monitoring     Yes       123 i     Transaction Screening including for sanctions     Yes       123 ix     Training & Education     Yes       123 i     Other (specify)     Yes       124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?     Yes       125 Confirm that all responses provided in the above section are representative of all the LE's branches     Yes       125 a     If N, clarify which questions the difference/s relate to and the branch/es that this applies to.     Yes       126 If appropriate, provide any additional information/context to the answers in this section.     Yes       127 Does the Entity have policies in place addressing fraud risk?     Yes       128 Does the Entity have a dedicated team responsible     Yes			
123 h       Technology       Yes         123 I       Transaction Monitoring       Yes         123 J       Transaction Screening including for sanctions       Yes         123 k       Training & Education       Yes         123 l       Other (specify)       Yes         124       Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?       Yes         125       Confirm that all responses provided in the above section are representative of all the LE's branches       Yes         125 a       If N, clarify which questions the difference/s relate to and the branch/es that this applies to,       Yes         126       If appropriate, provide any additional information/context to the answers in this section,       Yes         127       Does the Entity have policies in place addressing fraud risk?       Yes         128       Does the Entity have a dedicated team responsible       Yes	123 g	· · · · · ·	
123 J       Transaction Screening including for sanctions       Yes         123 k       Training & Education       Yes         123 l       Other (specify)       Yes         124       Are adverse findings from Internal & external audit tracked to completion and assessed for adequacy and completeness?       Yes         125       Confirm that all responses provided in the above section are representative of all the LE's branches       Yes         125 a       If N, clarify which questions the difference/s relate to and the branch/es that this applies to.       Yes         126       If appropriate, provide any additional information/context to the answers in this section.       Yes         127       Does the Entity have policies in place addressing fraud risk?       Yes         128       Does the Entity have a dedicated team responsible       Yes	123 h	Technology	
123 k       Training & Education       Yes         123 l       Other (specify)       Yes         124       Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?       Yes         125       Confirm that all responses provided in the above section are representative of all the LE's branches       Yes         125 a       If N, clarify which questions the difference/s relate to and the branch/es that this applies to.       Yes         126       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.         127       Does the Entity have policies in place addressing fraud risk?       Yes         128       Does the Entity have a dedicated team responsible       Yes		ů – – – – – – – – – – – – – – – – – – –	Yes
123 I       Other (specify)       Image: construction of the image: constructing construle of the image: construle of the image: const		<u> </u>	
Iracked to completion and assessed for adequacy and completeness?     Yes       125     Confirm that all responses provided in the above section are representative of all the LE's branches     Yes       125 a     If N, clarify which questions the difference/s relate to and the branch/es that this applies to.     Yes       126     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.       127     Does the Entity have policies in place addressing fraud risk?     Yes       128     Does the Entity have a dedicated team responsible     Yes			Yes
section are representative of all the LE's branches     Yes       125 a     If N, clarify which questions the difference/s relate to and the branch/es that this applies to,     If appropriate, provide any additional information/context to the answers in this section,       126     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,       127     Does the Entity have policies in place addressing fraud risk?     Yes       128     Does the Entity have a dedicated team responsible     Yes	124	tracked to completion and assessed for adequacy	Yas
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 enswers in this section,         126       If appropriate, provide any additional information/context to the enswers in this section,         127       Does the Entity have policies in place addressing fraud risk?         128       Does the Entity have a dedicated team responsible	125		Yes
Information/context to the answers in this section,     Information/context to the answers in the answer	125 a	If N, clarify which questions the difference/s relate to	
27     Does the Entity have policies in place addressing fraud risk?     Yes       28     Does the Entity have a dedicated team responsible	126		
127     Does the Entity have policies in place addressing fraud risk?     Yes       128     Does the Entity have a dedicated team responsible	4. FRAIL	D	· · · · · · · · · · · · · · · · · · ·
		Does the Entity have policies in place addressing	
	28		Yes

Does the Entity have real time monitoring to detect fraud? Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID? 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.	Yes Yes	
additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID? 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.		
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	Yes	
and the branch/es that this applies to. If appropriate, provide any additional		
up Correspondent Banking Due Diligence Questionnaire 2023 (CE latement (To be signed by Global Head of Correspondent Bank	ing or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of	
remain in full compliance with all applicable financial crime laws	on name) is fully committed to the fight against financial crime and makes s, regulations and standards in all of the jurisdictions in which it does business and holds accounts. re 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.		
Institution commits to file accurate supplemental information on	a timely basis.	
(Obbai Head c	f Correspondent Banking or equivalent), certify that I have read and understood this declaration, that my honest belief, and that I am authorised to execute this declaration on behalf of the Financial	
Institution. EDUARDO GARDE (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this		
IL <u>EDUARDO GARDE</u> (MLRO 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. (Signature & Date) (Signature & Date) (II/13) 20 23		
	aundering, Chief Compliance Officer, Global Head of Financial AO VIZCAYA ARGENTARIA, S.A. (Financial Institution remain in full compliance with all applicable financial crime laws Institution understands the critical importance of having effective latory obligations. Institution recognises the importance of transparency regarding Institution further certifies it complies with / is working to complete on provided in this Wolfsberg CBDDQ will be kept current and we Institution commits to file accurate supplemental information on GALIANA (Global Head of provided in this Wolfsberg CBDDQ are complete and correct to O GARDE (MLRO or equited) DDQ are complete and correct to my honest belief, and that I a	

# the Wolfsberg Group

Financial Institution Name: Location (Country) :

	No#	Question	Answer
1.	ENTITY	& OWNERSHIP	
1		Full Legal Name	
1		Tuli Legar Name	
2		Append a list of foreign branches which are covered	
		by this questionnaire	
3		Full Legal (Registered) Address	
_			
4		Full Primary Business Address (if different from	
		above)	
5		Date of Entity incorporation/establishment	
5		Bate of Entry moorporation/establishinent	
6		Select type of ownership and append an ownership	
		chart if available	
6 8	9	Publicly Traded (25% of shares publicly traded)	
		If Y, indicate the exchange traded on and ticker	
6	a I		
		symbol	
6	h	Member Owned/Mutual	
6		Government or State Owned by 25% or more	
6		Privately Owned	
6	a1	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	
-		shares	
		310103	
8		Does the Entity, or any of its branches, operate under	
		an Offshore Banking License (OBL)?	
8 ;	9	If Y, provide the name of the relevant branch/es	
-	-	which operate under an OBL	
9		Does the Bank have a Virtual Bank License or	
		provide services only through online channels?	
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)	

40	Installed a construction of the second	
13	Jurisdiction of licensing authority and regulator of	
	ultimate parent	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	
14 b	Private Banking	
14 c	Commercial Banking	
14 d	Transactional Banking	
	<u> </u>	
14 e	Investment Banking	
14 f	Financial Markets Trading	
	, and the second s	
14 g	Securities Services/Custody	
14 h	Broker/Dealer	
14 i	Multilateral Development Bank	
	•	
14 j	Wealth Management	
14 k	Other (please explain)	
14 K	Otilei (piease explain)	
15	Does the Entity have a significant (10% or more)	
15		
	portfolio of non-resident customers or does it derive	
	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	where bank services are provided)	
1	. ,	
15 a	If Y, provide the top five countries where the non-	
15 4		
	resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	
16 b	Total Assets	
17	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches.	
17 a	If N algorify which guagations the difference (a relate to	
17 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
10		
18	If appropriate, provide any additional	
	information/context to the answers in this section.	
2. PRODUC	CTS & SERVICES	
19	Does the Entity offer the following products and	
	services:	
19 a	Correspondent Banking	
19 a1	IfY	
19 a1a	Does the Entity offer Correspondent Banking	
	services to domestic banks?	
19 a1b	Does the Entity allow domestic bank clients to	
1	provide downstream relationships?	
40.4		
19 a1c	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	
	domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking	
	services to foreign banks?	
L	Ĵ	
19 a1e	Does the Entity allow downstream relationships	
	with foreign banks?	
	<u> </u>	
19 a1f	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	
	foreign banks?	
19 a1g	Does the Entity offer Correspondent Banking	
Jany		
1	services to regulated Money Services Businesses	
1	(MSBs)/Money Value Transfer Services (MVTSs)?	
10 - 11		
19 a1h	Does the Entity allow downstream relationships	
	with MSBs, MVTSs, or Payment Service Provider	
	(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?	
19 b	Cross-Border Bulk Cash Delivery	
19 c	Cross-Border Remittances	
19 c 19 d	Domestic Bulk Cash Delivery	
19 e	Hold Mail	
19 f	International Cash Letter	
19 g	Low Price Securities	
19 h	Payable Through Accounts	
19 i	Payment services to non-bank entities who may	
101	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 m	Trade Finance	
19 0	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 p2a 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.	
	If you offer other services to walk-in customers please provide more detail here, including	
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by	
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above	
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19 p5 19 q 20 20 a 21 3. AML, C1 22	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) 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. <b>F &amp; SANCTIONS PROGRAMME</b> Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise	
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22 m	Suspicious Activity Reporting	
22 n	Training and Education	
22 o	Transaction Monitoring	
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	
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.	
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	
4. ANTI E	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	
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 experience/expertise responsible for coordinating the ABC programme?	
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	
34	Is the Entity's ABC programme applicable to:	
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	
35 b	Includes enhanced requirements regarding interaction with public officials?	
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	
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?	
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	

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 u 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	<b>F &amp; SANCTIONS POLICIES &amp; PROCEDURES</b>	
5. AML, CT 46	F & SANCTIONS POLICIES & PROCEDURES Has the Entity documented policies and 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 46 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering	
46 46 a 46 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing	
46 46 a 46 b 46 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations	
46 46 a 46 b 46 c 47	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually?	
46 46 a 46 b 46 c 47 48	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against:	
46 46 a 46 b 46 c 47 48 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results?	
46 46 a 46 b 46 c 47 48 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards	
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46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 48 b 48 b 49	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 48 b 48 b 49 49 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 49 b 49 b 49 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 49 b 49 c 49 d	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 b 49 a 49 b 49 c 49 c 49 c 49 e	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 b 49 a 49 b 49 c 49 c 49 c 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks	
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46 46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 b 49 a 49 b 49 c 49 c 49 c 49 c 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 b 49 a 49 b 49 c 49 c 49 c 49 c 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de	

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 I	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	
	similar document which defines a risk boundary 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 means any ideal in the above	
32	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. AML. CTF	& SANCTIONS RISK ASSESSMENT	
6. AML, CTF 54	& SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	
54 54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	
54 a 54 b 54 c 54 d 55 55 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	
54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	
54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	
54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c 55 c 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	
54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	
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58 e	Name Careening	
58 f	Name Screening	
58 f 58 g	Transaction Screening Training and Education	
58 g 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 Source of funds	
64 g 64 h	Source of runds 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 67 a3	Geography	
67 a3 67 a4	Business Type/Industry Legal Entity type	
67 a4	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 68 a4	Trigger event 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 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	5 years or more	
74 a5	Trigger-based or perpetual monitoring reviews	
74 a6	Other (Please 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	Virtual Asset Service Providers	
76 y	Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	

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	
01 a	and the branch/es that this applies to	
0.0		
82	If appropriate, provide any additional information/context to the answers in this section.	
8. MONITO	DRING & REPORTING	
83	Does the Entity have risk based policies, procedures	
	and monitoring processes for the identification and	
	reporting of suspicious activity?	
04	What is the method used by the Entity to monitor	
84	transactions for suspicious activities?	
<u> </u>		
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?	
04 62	When was the outemated Transaction Manitaring	
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	
05 a	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?	
	Deep the Entity have processes in place to reason it	
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.	
9. PAYME	NT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group	
1	Payment Transparency Standards?	

93	Does the Entity have policies, procedures and	
55		
	processes to comply with and have controls in place	
	to ensure compliance with:	
93 a	FATF Recommendation 16	
93 b	Local Regulations	
93 b1	If Y, specify the regulation	
55 51		
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	
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 beneficiary address including country in cross 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	
100 u	Sanctions List (UN)	
106 b	United States Department of the Treasury's Office of	
	Foreign Assets Control (OFAC)	
106 c	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	
101	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	
107 5		
100	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	
100	Section are representative of all the LE's branches	
100		
109 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
110	lf annun viete, mussiale en verdeltienel	
110	If appropriate, provide any additional	
	information/context to the answers in this section.	
	G & 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	
	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	
	2nd Line of Defence	
112 c		
112 d	3rd Line of Defence	
112 e	Third parties to which specific FCC activities have	
	been outsourced	
112 f	Non-employed workers (contractors/consultants)	
1121		
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	

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	14 · · · · · · · · · · · · · · · · · · ·	
116	If appropriate, provide any additional information/context to the answers in this section.	
12. QUALITY	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)?	
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	
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		
13. AUDII 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?	
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	
122 b	External Third Party	
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 123 d	Governance KYC/CDD/EDD and underlying methodologies	
123 u 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 123 k	Transaction Screening including for sanctions Training & Education	
123 I	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.	
14. FRAUD		
127	Does the Entity have policies in place addressing fraud risk?	
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	

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 Gr	oup Correspondent Banking Due Diligence Questionnaire 2023 (Cl	
Declaration S	Statement (To be signed by Global Head of Correspondent Banl	xing 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)
		ion name) is fully committed to the fight against financial crime and makes
every enort t	to remain in fuil compliance with all applicable financial crime laws	s, regulations and standards in all of the jurisdictions in which it does business and holds accounts.
		ve and sustainable controls to combat financial crime in order to protect its reputation and to meet its
legal and reg	ulatory obligations.	
	al Institution recognises the importance of transparency regardir	g parties to transactions in international payments and has adopted/is committed to adopting these
standards.		
	al Institution further certifies it complies with / is working to complion provided in this Wolfsberg CBDDQ will be kept current and v	y with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. vill be updated no less frequently than every eighteen months.
The Financia	al Institution commits to file accurate supplemental information or	a timely basis
	(Global Head	of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that
the answers		my honest belief, and that I am authorised to execute this declaration on behalf of the Financial
Institution.		
I,		ivalent), certify that I have read and understood this declaration, that the answers provided in this
Wolfsberg C	BDDQ are complete and correct to my honest belief, and that I a	am authorised to execute this declaration on behalf of the Financial Institution.
	(Signature & Dat	e)
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	$\rightarrow$	
	(Signature & Dat	e)
	l.	

#### the Wolfsberg Group

Financial Institution Name: Location (Country) :

Name: BBVA Bank Talwan

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		
1.	i di Eoga Hano	BBVA Bank	
2	Append a list of foreign branches which are covered	Taipei branch	
	by this questionnaire		
3	Full Legal (Registered) Address	Unit D, Level 45, Taipel 101 Tower, No.7 Xinyi Rd, Sec 5, Talpei City11049, Taiwan, ROC	
4	Full Primary Business Address (If different from		
	above)		
]			
5	Date of Entity incorporation/establishment	110000011	
ľ	but of ching most providence and an and	11/23/2011	
-			
6	Select type of ownership and append an ownership chart if available		
6 a	Publicly Traded (25% of shares publicly Iraded)	Please select	
6 a 1	If Y, indicate the exchange traded on and ticker		
	symbol		
6 b	Member Owned/Mutual		<b>.</b>
6 c	Government or State Owned by 25% or more	Please select	Ε
6 d	Privalely Owned	Please select	
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		
	shares		
8	Does the Enlity, or any of its branches, operate under		
-	an Olíshore Banking License (OBL)?	Please select	
8a	If Y, provide the name of the relevant branch/es		]
v.	which operate under an OBL		i
	Does the Bank have a Virtual Bank License or	Please select	
	provide services only through online channels?		
10	Name of primary financial regulator/supervisory	Financial Supervisory Committee (FSC)	
	authority		
11	Provide Legal Entity Identifier (LEI) if available		
			ſ
12	Provide the full legal name of the ultimate parent (if		
	different from the Entity completing the DDQ)		
· · ·			

		· · · · · · · · · · · · · · · · · · ·
13	Jurisdiction of licensing authority and regulator of	
	ultimate parent	
14	Select the business areas applicable to the Entity	· · · · · · · · · · · · · · · · · · ·
14 a	Retail Banking	No
14 b	Private Banking	
14 c	Commercial Banking	No Lats
14 d		
	Transactional Banking	Yes Control Yes
14 e	Investment Banking	No
14 (	Financial Markets Trading	No
14 g	Securities Services/Custody	No Line Line Line Line Line Line Line Line
14 h	Broker/Dealer	No
141	Multitateral Development Bank	No <b>Y</b>
14 j	Wealth Management	No
-	÷	NO
14 k	Other (please explain)	
15	Does the Entity have a significant (10% or more)	
	portícia of non-resident customers or does it derive	
	more than 10% of its revenue from non-resident	
	customers? (Non-resident means customers primarily	No
	resident in a different jurisdiction to the location	
	where bank services are provided)	
	witere park services die brovided)	
15 a	If Y, provide the top five countries where the non-	
	resident customers are located.	
-		
16	Select the closest value;	
16 a	Number of employees	1-50
16 b	Total Assets	Between \$10 and \$100 million
17		Between \$10 and \$100 million
14	Confirm that all responses provided in the above	Please select
	Section are representative of all the LE's branches.	
17 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
	- · · · · · · · · · · · · · · · · · · ·	
18	If appropriate, provide any additional	
	information/context to the answers in this section,	
	JCTS & SERVICES	
19	Does the Entity offer the following products and	
	services:	
19 a	Correspondent Banking	No
19 a1	ПY	
19 a1a		
	Does the Enlity offer Correspondent Banking services to domestic banks?	Please seloci
19 a1b	Does the Entity allow domestic bank clients to	Please select
	provide downstream relationships?	
19 a1c	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	Please select
	domeslic banks?	
40 - 1 I		
19 a1d	Does the Entity offer Correspondent Banking	Please select
	services to foreign banks?	
19 a1e	Does the Entity allow downstream relationships	Place estat
	with foreign banks?	Please select
19 a1(	Does the Enlity 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	No
	(MSBs)/Money Value Transfer Services (MVTSs)?	
19 a1h	Does the Entity allow downstream relationships	
	with MSBs, MVTSs, or Payment Service Provider	
	(PSPs)?	
19 a <b>1</b> h1	MSBs	No
19 a1h2	MVTSs	No
19 a1h3	PSPs	No <b>C</b>
	r · ·	less less less les les les les les les l

19 a1i 19 b 19 c 19 c 19 d 19 d 19 f 19 f 19 j 19 j 19 j 19 j 19 j 19 j 19 j 19 j	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs? Cross-Border Bulk Cash Delivery Cross-Border Remittances Domestic Bulk Cash Delivery Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their	No No Contraction of the second secon
19 c 19 d 19 e 19 f 19 g 19 h 19 i 19 i1 19 i2	MSBs /MVTSs/PSPs? Cross-Border Bulk Cash Delivery Cross-Border Remittances Domestic Bulk Cash Delivery Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their	No Carlor
19 c 19 d 19 e 19 f 19 g 19 h 19 i 19 i1 19 i2	Cross-Border Bulk Cash Delivery Cross-Border Remittances Domestic Bulk Cash Delivery Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their	Yes Carlor
19 c 19 d 19 e 19 f 19 g 19 h 19 i 19 i1 19 i2	Cross-Border Remittances Domestic Bulk Cash Delivery Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their	Yes Carlor
19 c 19 d 19 e 19 f 19 g 19 h 19 i 19 i 19 i 19 i 19 i 19 i 19 i 19 i	Cross-Border Remittances Domestic Bulk Cash Delivery Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their	Yes
19 d 19 e 19 f 19 g 19 h 19 i 19 i 19 i 19 i 19 i 19 i 19 i 19 i	Domestic Bulk Cash Delivery Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their	No Contraction Con
19 e 19 f 19 g 19 h 19 i 19 i 19 i 19 i 19 i 19 i 19 i 19 i	Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their	No Carlor
19 f 19 g 19 h 19 i 19 i 19 i 19 i 19 i 19 i 19 i 19 i	International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their	No
19 g 19 h 19 h 19 i 19 i 19 i 19 i 19 i 19 i 2	Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their	No
19 h 19 i 19 i 19 i1 19 i2	Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their	
19 i 19 i1 19 i2	Payment services to non-bank entities who may then offer third party payment services to their	
19 i1 19 i2	Payment services to non-bank entities who may then offer third party payment services to their	
19 i1 19 i2	then offer third party payment services to their	
19 i2	customers?	No
19 i2		<u>ــا</u>
	If Y, please select all that apply below?	
	Third Party Payment Service Providers	No
19 13	Virtual Asset Service Providers (VASPs)	No
19 i4	eCommerce Platforms	No G
19 15	Other - Please explain	
	Oures - riease explain	
19 j	Private Banking	No E
19 k	Remote Deposit Capture (RDC)	No La
191	Sponsoring Private ATMs	
	, ,	
19 m	Stored Value Instruments	No
19 n	Trade Finance	Yes
19 0	Virlual Assels	No
19 p	For each of the following please state whether you	
	offer the service to walk in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	No E
19 p1a	If yes, state the applicable level of due diligence	
		Please solect
19 p2	Wire transfers	Yes
19 p2a	If yes, state the applicable level of due diligence	Identification
19 p3	Foreign currency conversion	No
19 p3a	If yes, slate 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 delai! here, including describing the level of due diligence,	
19 q	Other high-risk products and services identified by	
14 1	the Entity (please specify)	
	Confirm that all responses provided in the above	Please select
20 a	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
	If appropriate, provide any additional information/context to the answers in this section.	
	F & SANCTIONS PROGRAMME	La
	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
í	Appointed Officer with sufficient experience/experting	Diasea salaci
í 22 a	Appointed Officer with sufficient experience/expertise	Pléase select
í 22 a 22 b	Adverse Information Screening	Please select
1 22 a 22 b 22 c	Adverse Information Screening Beneficial Ownership	Please select Please select
1 22 a 22 b 22 c 22 d	Adverse Information Screening Beneficial Ownership Cash Reporting	Please select
1 22 a 22 b 22 c 22 d	Adverse Information Screening Beneficial Ownership	Please select Please select
1 22 a 22 b 22 c 22 d 22 e	Adverse Information Screening Beneficial Ownership Cash Reporting	Please select Please select Please select Please select Please select Please select
1 22 a 22 b 22 c 22 d 22 d 22 e 22 f	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	Please select
1 22 a 22 b 22 c 22 d 22 d 22 e 22 f 22 f 22 g	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Please select       Please select       Please select       Please select       Please select       Please select
1 22 a 22 b 22 c 22 d 22 d 22 e 22 f 22 g 22 g 22 h	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Please select
f 22 a 22 b 22 c 22 d 22 c 22 d 22 e 22 f 22 g 22 h 22 2 h 22 2 h 22 2 h 22 1 22 1	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Please select
1           22 a           22 b           22 c           22 d           22 e           22 f           22 g           22 h           22 i           22 i	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Please select
í 22 a	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Please select

22 m	Suspicious Activity Reporting	Please soloct
22 n	Training and Education	Please select
22 0	Transaction Monitoring	Please select
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	11-100
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.	Please select
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Please select
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Please select
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	Talpei branch does not dea) with Cash
4. ANTIE	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Please select
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	No
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Please select
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Please select
34	Is the Enlity's ABC programme applicable to:	Nol Applicable
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly. if improperly intended to influence action or obtain an advantage.	Please select
35 b	Includes enhanced requirements regarding interaction with public officials?	Please select
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Please select
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Please select
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Ploase select
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Please select
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?	No
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Please select
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Please select

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	Please select
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Please select
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Please select
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Please select
42	Does the Entity provide mandatory ABC Iraining to:	
42 a	Board and senior Committee Management	
42 b	1st Line of Defence	Please select
42 c 42 d	2nd Line of Defence	Please select
42 d 42 e	3rd Line of Defence Third parties to which specific compliance activities	
	subject to ABC risk have been outsourced	No 🔽
42 (	Non-employed workers as appropriate (contractors/consultants)	Nol Applicable
43	Does the Entity provide ABC training that is largeled to specific roles, responsibilities and activities?	Please select
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Ploase select
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional Information/context to the answers in this section.	
5. AML. C	TF & SANCTIONS POLICIES & PROCEDURES	
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		
46 b	Money laundering Terrorist financing	Please solect
46 c	Sanctions violations	Please select Please select
47	Are the Entity's policies and procedures updated at	Please select
48	least annually? Has the Entity chosen to compare its policies and	
40 -	procedures against:	
48 a	U.S. Standards	Please select
48 a1 48 b	If Y, does the Entity relain a record of the results? EU Standards	Please select
48 b1	If Y, does the Entity retain a record of the results?	Please select
40 01	Does the Enlity have policies and procedures that;	Please select
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Please select
49 b	Prohibil the opening and keeping of accounts for unlicensed banks and/or NBFIs	Please select
49 c	Prohibil dealing with other entities that provide banking services to unlicensed banks	Please select
49 d	Prohibil accounts/relationships with shell banks	Please select
49 e	Prohibit dealing with another entity that provides services to shell banks	Please solect
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Please seloci
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	Please select
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Please soloct

491	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Please solect
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Ploase select
49 K	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and alfiliates	Please select
491	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Please select
49 m	Oulline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Please select
49 n	Oulline the processes for the maintenance of internal "watchlists"	Please select
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Please select
51	Does the Entity have record retention procedures that comply with applicable laws?	Please select
51 a	If Y, what is the retention period?	Please select
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
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 AML CT	F & SANCTIONS RISK ASSESSMENT	
54	Does the Enlity's AML & CTF EWRA cover the inherent risk components detailed below;	
54 a	Client	Please select
54 b	Product	Please select
54 c	Channe!	Please select
54 d	Geography	Please select
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
55 a	Transaction Monitoring	Please select
55 b	Customer Due Dillgence	Please select
55 с	PEP Identification	Please select
55 đ	Transaction Screening	Please solect
55 e	Name Screening against Adverse Media/Negalive News	Please select
55 f	Training and Education	Please select
55 g	Governance	Please select
55 h	Management Information	Ploase select
56	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Please select
56 a	If N, provide the date when the last AML & CTF EWRA was completed.	
57	Does the Enlity's Sanctions EWRA cover the inherent risk components detailed below;	
57 a	Client	Please select
57 b	Product	Please seleci
57 C	Channel	Please select
57 d	Geography	Please select
58	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
58 a	Cuslomer Due Diligence	Please select
58 b	Governance	Please select
58 c	ListManagement	Please select
	Listmanagement	
58 d	Management Information	Please select

		r <sup>a</sup>
58 e	Name Screening	Please select
58 f	Transaction Screening	Please select
58 g	Training and Education	Please select
59	Has the Enlity's Sanctions EWRA been completed in the last 12 months?	Please select
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	Please solect
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?	Please select
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?	Please select
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Please select
64 b	Expected activity	Please select
64 c	Nature of business/employment	Please select
64 d	Ownership structure	Please sclect
64 e 64 f	Product usage	Please select
64 g	Purpose and nature of relationship Source of funds	Please select
64 g 64 h	Source of wealth	Please select
65	Are each of the following identified:	Please select
65 a	Ullimate beneficial ownership	
65 a1	Are ultimate beneficial owners verified?	Please select
65 b	Authorised signatories (where applicable)	Please select
65 c	Key controllers	Please select
65 d	Other relevant parties	Please select
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	Please select
67	Does the due diligence process result in customers receiving a risk classification?	Please select
67 a	if Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a <b>1</b>	Product Usage	Please select
67 a2	Geography	Please select
67 a3	Business Type/Industry	Please select
67 a4	Legal Enlity type	Please select
67 a5 67 a6	Adverse Information	Please select
6 <i>1</i> 40	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Please select
68 a	If Y, is this at:	
68 a1 68 a2	Onboarding KYC renewal	Please select
68 a2 68 a3	Trigger evant	Please select
68 a4	Other	Please select
68 a4a	If yes, please specify "Other"	Please select
69 69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Please solect
69 a 69 a1	If Y, is this at: Onboarding	
69 a1	KYC renewal	Please select
70 GT		Please select

70         Wate is no motion due to by the Endy sources for cardiomes and consoled price 5 diamine when cardiomes and consoled price 5 diamine when the set elect         Peace seted           71         Constraines and consoled price 5 diamine when the set elect         Peace seted           71         Constraines and consoled price 5 diamine when the set elect         Peace seted           71         Constraines and consoled price 5 diamine when the set elect         Peace seted           71         Constraines and consoled price 5 diamine when the set elect         Peace seted           71         Constraines and consoled price 5 diamine when the set elect         Peace seted           71         Constraines and consoled price 5 diamine when the set elect         Peace seted           72         Constraines and console PEPs7         Peace seted           73         Constraines and console PEPs7         Peace seted           74         I sets fraine constraines and console PEPs7         Peace seted           74         I sets fraine constraines and console PEPs7         Peace seted           74         I sets fraine constraines and console PEPs7         Peace seted           74         I sets fraine constraines and console PEPs7         Peace seted           74         I sets fraine constraines and console PEPs7         Peace seted           74         I sets fraines console	60 - 2		
Adverse Mediukregelve New?         Place select           71         Oost to Entity huw an into some approach to scalar the optical select         Place select           71         Image: Select to Entity huw an into some approach to scalar the optical select         Place select           71         Image: Select to Entity huw an into some approach to scalar the optical select to Entity huw an into some approach to scalar the optical select to Entity huw an into some approach to scalar the optical select to Entity huw an into some approach to scalar the optical select to Entity huw and scalar to produce the optical select to Entity huw and scalar to produce the optical select to Entity huw and scalar to produce the optical select to Entity huw and scalar to produce the optical select to Entity huw and scalar to produce the optical select to Entity huw and the scalar select to Entity huw and scalar to produce the optical select to Entity huw and scalar to produce the optical select to Entity huw and scalar to produce the optical select to Entity huw and the scalar select to Entity huw andity huw andity huw and the scalar select to Entity huw andity huw	69 a3	Trigger event	Please select
cutomes and connected parties is determine whether Pears outed         Pears outed           71 al.         IPV, is it is at: Pears outed         Pears outed           71 al.         IPV, or control by VPCPa?         Pears outed           71 al.         IPV, or control by VPCPa?         Pears outed           71 al.         IPV, or control by the Endy to coron PPCPA?         Pears outed           72         Does the Drift have parties to determine whather Pears outed         Pears outed           73         Does the PC, or control and log log back to determine whather Pears outed         Pears outed           74         IFV, to conce all collined forgace allog to determine whather Pears outed         Pears outed           74         IFV, concerved at Colline program PPC or control and parties to determine whather Pears outed         Pears outed           74         IFV, concerved at Colline program PPC or control and to the program PPC or control and the progr		Adverse Media/Negative News?	
71 al.     Oncoording.     Press solid.       71 al.     Ying Common     Press solid.       71 al.     Ying Common     Press solid.       71 al.     Ying the method used by the Ently to score PEPs?     Press solid.       72     Wata the method used by the Ently to score PEPs?     Press solid.       73     Wata the method used by the Ently to score PEPs?     Press solid.       74     Trigger Associated Supplies to definition witholing common score particle to definition score partin score particle to definition score particle to definiti	71	customers and connected parties to determine whether	
71 a3     Trigor cont     Pears select       72     What is the method used by the Entity to screen FLPS?     Pears select       73     Does the Entity two policies, is concluded and the Streen FLPS?     Pears select       74     B YC? remeval at all and policies to determine the Streen FLPS?     Pears select       74     B YC? remeval at all and the Streen FLPS?     Pears select       74     B YC? remeval at all and the Streen FLPS?     Pears select       74     B YC? remeval at all and the Streen FLPS?     Pears select       74     B YC? remeval at all and the Streen FLPS?     Pears select       74     B YC? remeval at all and the Streen FLPS?     Pears select       74     A YC? remeval at all and the Streen FLPS?     Pears select       74     A YC? remeval at all and the Streen FLPS?     Pears select       74     A YC? remeval at all and report motifs on current and part pelvicitor ringer event due at perificied, or participation motifs on remeval at an efficied, or participation for the Streen PLPS remeval at a differen remeval?       75     Poes the Entity maintain and report motifs on remeval remeval to the Streen PLPS remeval at a method remeval remeval to the Streen PLPS remeval		If Y, is this at;	
71 43     Trigger avent     Place seed       72     Work the method used by the Endly to zerose     Place seed       73     Work the method used by the Endly to zerose     Place seed       74     Date the Fifty how publics, procedures and processes     Place seed       74     Date the Fifty how publics, procedures and processes     Place seed       74     Date the Fifty or zerose     Place seed       74     Tate fifth or zerose     Place seed       75     Does be Ently maintain and report monitoring reviews     Place seed       76     Porm the list belack, which categories of cauternes or reduct     Place seed       76     Respondent Bank     Place seed			Please select
72       Weak is an enclosused by the Enclosuse of the Enclosus of the Enc			
73       Does the Edity have pokets, proceedures and processor bey are PErk, so control and churs for sovering provide and exact power by PErk?       Pesse select         74       Liss Than one year       Pesse select         75       Dees the Ently maintain and report metrics on current and pain perkofacy trigger event due difgence reviews?       Pesse select         76       Form the list below, which categories to customars or neutrines an subject to DD addor on an expending triggits 2027       Pesse select         76       Pars defect       Pesse select       Pesse select         76       Pesse select       Pesse select       Pesse select         76       Pesse select       Pesse select       Pesse select       Pesse select         76       Pesse select       Pesse select       Pesse select       Pesse select         76       Pesse select       Pesse select       Pesse sel		· · · · · · · · · · · · · · · · · · ·	
Sorvice and scalarly potential indication from screening customers and concered parks to determine while rating (Pariotal Reviews)?         Pears saled           74         If yes, solved if an apply;         Pears solved			Please select
raing (Periodic Reviews)?         Periodic Status           74         I. (periodic Reviews)?         Please select           74         I. Less than nor syear         Please select           74         3 4 years         Please select           74         5 4 years         Please select           74         5 4 years         Please select           74         5 4 years         Please select           74         6 4 years         Please select           74         6. Other (Please specify)         Please select           75         Does the Entity maintain and raport motifies on uarrest and park portical cor trigger own the difference reviews?         Please select           76         From the list below, which catagoids of customers or inducting an outpice to DD and/or are matched, or porbiblied by the Entity AFCC programme?         Please select           76         A may defence, miltray         Please select         Please select           76         Promote list below, which catagoids and customers or inducting an outpice and of the Molliberg Correspondered Banking Principles 2022?         Please select           76         A may defence, miltray         Please select         Please select           76         Entity and the Molliberg Correspondered Banking Principles 2022?         Please select         Te	73	to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Please select
74 af     Less than non year     Plaze select       74 a2     1 – 2 years     Plaze select       74 a3     3 – 4 years     Plaze select       74 a4     5 years or more     Plaze select       74 a5     Trigger-Anador or porpolus monitoring reviews     Plaze select       74 a6     Other (Rease specify)     Plaze select       75     Dees the Entity maintain and report motifics on current and para portical cor tigger event due difgence reviews?     Plaze select       76     From the list bolow, which estagards of calormets or reviews?     Plaze select       76     From the list bolow, which estagards of calormets or reviews?     Plaze select       76     A rans, defence, million of the Wolfshop Corgramme?     Plaze select       76     A rans, defence, million of the Wolfshop Corgramme?     Plaze select       76     From the list bolow which estagards     Plaze select       76     A rans, defence, million of the Wolfshop Corgramme?     Plaze select       76     A rans, defence, million of the Wolfshop Corgramme?     Plaze select       76     Extractive industries     Plaze select       76     General Trading Companies     Plaze select       76     General Trading Companies     Plaze select       76     Mon-Government Grantalators     Prohited       76     Non-Government Grantalators </td <td>_</td> <td>rating (Periodic Reviews)?</td> <td>Please select</td>	_	rating (Periodic Reviews)?	Please select
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74 96     Other (Please specify)       75     Does the Entity maintain and report metrics on current and past particular or trigger event due diligence reviews?     Please select       76     From the list below, which categories of nutwises are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?     Please select       76     A may, defence, millary     Prohibited     Image: select       76 b1     Respondent Banks     Please select       76 b1     Respondent Banks     Please select       76 b1     Respondent Banks     Please select       76 c     Embassies/Consulates     Please select       76 d     General Trading Companies     Please select       76 d     MSBMVTS customers     Prohibited     Image: select       76 d     Mon-account customers     Prohibited     Image: select       76 d     Mon-account customers     Prohibited     Image: select       76 d     Mon-account customers     Prohibited     Image: select       76 h     MSBMVTS customers     Prohibited     Image: select       76 h     MSBMVTS customers     Prohibited     Image: select </td <td></td> <td></td> <td></td>			
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78 a     Gambling ouslomers     Prohibited       76 f     General Trading Companies     Please select       78 g     Marijuana-rolated Entities     Please select       76 h     MSBM/TS customers     Please select       76 h     MSBM/TS customers     Please select       76 h     Mon-account customers     Prohibited     Image: Select       76 h     Mon-Government Crganisations     Prohibited     Image: Select       76 h     Non-resident customers     Prohibited     Image: Select       76 n     Payment Service Providers     EDD on risk-based approach     Image: Select       76 n     PEP Close Associates     Please select     Image: Select       76 o     PEP Close Associates     Please select     Image: Select       76 n     Per Netited     Please select     Image: Select       76 n     PEP Close Associates     Please select     Image: Select       76 n     PEP Reliad     Please select     Image: Select       76 n     Red light businesses/Adult entertainment     Please select       76 s     Regulated charities     Please select       76 u     Travel and Tour Companies     Please select       76 w     Used Car Dealers     Please select       76 w     Used Car Dealers     Please select <td>76 c</td> <td>Embassies/Consulates</td> <td>EDD on risk-based approach</td>	76 c	Embassies/Consulates	EDD on risk-based approach
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76 h     MSB/AVTS customers     Ploase solect       76 i     Non-account customers     Prohibiled     Image: Control Contect Contecles      76    Vintual A	76 g	Marijuana-related Entities	Please select
76 i     Non-account customers     Prohibited       76 i     Non-Government Organisations     Prohibited       76 k     Non-resident customers     Prohibited       76 k     Nuclear power     Please select       76 m     Payment Service Providers     EDD on risk-based approach       76 n     PEPS     Please select       76 o     PEP Close Associates     Please select       76 q     Preclous metals and stones     Please select       76 r     Red light businesses/Adult entertainment     Please select       76 u     Travel and Tour Companies     Please select       76 w     Used Car Dealers     Please select       76 x     Virtual Asset Service Providers     Please select       76 x     Does EDD require senior business management and/     Please select			Ptease select
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Dispessed			
		or compliance approval?	Please select

78 a	If Y indicate who provides the approval:	Please select
79	Does the Entity have specific procedures for	
	onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Please select
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Please select
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
81a	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	I ORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Please select
64	What is the method used by the Entity to monitor transactions for suspicious activilies?	Combination of automaled and manual
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?	Please select
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	
84 <b>b</b> 2	When was the tool last updated?	Ploase select
84 b3	When was the automated Transaction Monitoring application last calibrated?	Please select
85	Does the Entity have regulatory requirements to report suspicious transactions?	Please select
<b>8</b> 5 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Please select
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Please select
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Please select
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Please select
89	Does the Enlity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Please select
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Ploase select
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.	
92	Does the Enlity adhere to the Wolfsberg Group	
	Payment Transparency Standards?	Please select

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       Please select         93 b       Local Regulations       Please select         93 b1       (FY, specify the regulation       Please select         93 c       If N, explain       Please select         93 c       If N, explain       Please select         94       Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?       Please select         95       Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?       Please select         95 a       If Y, doas the Entity have procedures to include beneficiary address including country in cross border payment messages?       Please select         95 a       If Y, doas the Entity have procedures to include beneficiary address including country in cross border payments?       Please select         96       Confirm that all responses provided in the above Section are representative of all the LE's branches       Please select         96 a       If N, clarify which questions the difference/s relate to and the branch/es that this applies to.       Please select	
93 b       Local Regulations       Please solect         93 b1       If Y, specify the regulation       If N, explain         93 c       If N, explain       Please solect         93 d       Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?       Please select         95       Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?       Please select         95 a       If Y, does the Entity have procedures to include beneficiary address including country in cross border payment messages?       Please select         96       Confirm that all responses provided in the above Section are representative of all the LE's branches       Please select         96 a       If N, clarify which questions the differenco/s relate to and the branch/es that this applies to.       Please select	
93 b       Local Regulations       Please solect         93 b1       If Y, specify the regulation       If N, explain         93 c       If N, explain       Please solect         93 d       Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?       Please select         95       Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?       Please select         95 a       If Y, does the Entity have procedures to include beneficiary address including country in cross border payment messages?       Please select         96       Confirm that all responses provided in the above Section are representative of all the LE's branches       Please select         96 a       If N, clarify which questions the differenco/s relate to and the branch/es that this applies to.       Please select	······
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93 c       If N, explain         94       Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?         95       Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?         95       Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?         95       Does the Entity have procedures to include beneficiary information cross-border payment messages?         95 a       If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?         96       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.	
94       Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?       Please select         95       Does the Entity have controls to support the Inclusion of required beneficiary information cross-border payment messages?       Please select         95       Does the Entity have controls to support the Inclusion of required beneficiary information cross-border payment messages?       Please select         95       Does the Entity have procedures to include beneficiary address including country in cross border payments?       Please select         96       Confirm that all responses provided in the above Section are representative of all the LE's branches       Please select         96 a       If N, clarify which questions the difference/s relate to and the branch/es that this applies to.       Please select	
of required and accurate originator information in cross border payment messages?       Please select         95       Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?       Please select         95 a       If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?       Please select         96       Confirm that all responses provided in the above Section are representative of all the LE's branches       Please select         96 a       If N, clarify which questions the difference/s relate to and the branch/es that this applies to.       Please select	
of required beneficiary information cross-border payment messages?     Please select       95 a     If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?     Please select       96     Confirm that all responses provided in the above Section are representative of all the LE's branches     Please select       96 a     If N, clarify which questions the difference/s relate to and the branch/es that this applies to.     Please select	
beneficiary address including country in cross border payments?     Please select       96     Confirm that all responses provided in the above Section are representative of all the LE's branches     Please select       96 a     If N, clarify which questions the difference/s relate to and the branch/es that this applies to.     Please select	
Section are representative of all the LE's branches     Please select       96 a     If N, clarify which questions the difference/s relate to and the branch/es that this applies to.     If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
and the branch/es that this applies to.	
97 If appropriate, provide any additional information/context to the answers in this section,	
10. SANCTIONS	
98 Does the Enlity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Enlity, 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 laken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?       Please select	
101         Does the Enlity screen Its customers, including beneficial ownership information collected by the Enlity, during onboarding and regularly thereafter against Sanctions Lists?         Please select	
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? Please select	
102 a1a If a 'vendor-sourced loof' or 'both' selected, what is the name of the vendor/loof?	
102 a2 When did you last test the effectiveness (of finding Irue 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?       Please select	
104 What is the method used by the Entity? Please select	

;

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Please select
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Please select
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Please select
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Please select
106 d	European Union Consolidated List (EU)	Piease salect
106 e	Lisis maintained by other G7 member countries	Please select
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	Please select
107 b	Transactions	Please select
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?	Please select
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
109 a	II 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	G & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Idenlification and reporting of transactions to government authorities	Please select
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Please select
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Please select
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Please select
111 e	Conduct and Culture	Please solect
111 f	Fraud	Please select
112 112 a	Is the above mandatory training provided to: Board and Senior Committee Management	Disease as feed
112 a 112 b	1st Line of Defence	Piease select
112 c	2nd Line of Defence	Please select
112 d	3rd Line of Defence	Please select
112 e	Third parties to which specific FCC activities have been outsourced	Please select
112 f	Non-employed workers (contractors/consultants)	Piease select
113	Does the Entity provide AML, CTF & Sanctions training that is largeled to specific roles, responsibilities and high-risk products, services and activities?	Please select
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Please select
114 a	IFY, how frequently is training delivered?	Please select
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)?	Please select
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the indopendent Audit function)?	Please select
119	Confirm that all responses provided in the above Section are representative of all the LE's branchos	Please select
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 lesting function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Please solect
122	How often is the Enlity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Please select
122 b	External Third Party	Please select
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	Picase select
123 b	Enterprise Wide Risk Assessment	Please select
123 c 123 d	Governance	Picase select
123 c	KYC/CDD/EDD and underlying methodologies Name Screening & List Management	Please select
123 f	Reporting/Metrics & Management Information	Please select Please select
123 g	Suspicious Activity Filing	Please select
123 h	Technology	Please select
123 i	Transaction Monitoring	Please select
123 j	Transaction Screening including for sanctions	Please select
123 k	Training & Education	Please select
1231	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,	
4. FRAU	D	
127	Does the Entity have policies in place addressing fraud risk?	Piease seleci
128	Does the Entity have a dedicated learn responsible for preventing & detecting fraud?	Please solect

CBDDQ '

129	Does the Entity have real time monitoring to detect fraud?	Please select
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?	Please select
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Please select
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to,	
132	If appropriate, provide any additional information/context to the answers in this section.	

#### **Declaration Statement**

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4) Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)

BBVA Bank Taiwan Branch. (Financial Institution name) is fully committed to the light 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.

James Kao I, LIAMES KAO (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 Yan Vavid I, <u>VAVAL</u>IAN. (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsbarg CBDDQ are complete and correct to my partiest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution, nalure & Dale) (Signature & Date) 8023, 12,14

## the Wolfsberg Group

Financial Institution Name: BBVA S.A., Niederlassung Deutschland Location (Country) : Germany

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 at the legal entry level including 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	in the second
1	Full Legal Name	Banco Bilbao Vizcaya Argentaria S.A.
2	Append a list of foreign branches which are covered by this questionnaire	Banco Bilbao Vizcaya Argentaria S.A., Niederlassung Deutschland
3	Full Legal (Registered) Address	Neue Mainzer Str. 28, 60311 Frankfurt am Main
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	2007
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Please select
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	Please select
6 c	Government or State Owned by 25% or more	Please select
6 d	Privately Owned	Please select
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 shares	
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	Please select
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	Please select
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)	

13	Jurisdiction of licensing authority and regulator of	
	ultimate parent	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	No
14 b	Private Banking	No
14 c	Commercial Banking	Please select
14 d	Transactional Banking	
		Please select
14 e	Investment Banking	Please select
14 f	Financial Markets Trading	Please select
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	Please select
14 j	Wealth Management	No
14 k	Other (please explain)	NO
14 K	Other (please explain)	
15	Does the Entity have a significant (10% or more)	
	portfolio of non-resident customers or does it derive	
1	more than 10% of its revenue from non-resident	
	customers? (Non-resident means customers primarily	Please select
	resident in a different jurisdiction to the location where bank services are provided)	
	where bank services are provided)	
15 a	If Y, provide the top five countries where the non-	
	resident customers are located.	
	resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	1-50
16 b	Total Assets	
		Please select
17	Confirm that all responses provided in the above	Please select
	Section are representative of all the LE's branches.	- 10030 3010U
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.	
	JCTS & SERVICES	
19	Does the Entity offer the following products and	
	services:	
19 a	Correspondent Banking	No
19 a1	IfY	NU
19 a1a	Does the Entity offer Correspondent Banking	Please select
	services to domestic banks?	
19 a1b	Does the Entity allow domestic bank clients to	
	provide downstream relationships?	Please select
19 a1c	Does the Entity have processes and procedures	
13 410	in place to identify downstream relationships with	
		Please select
	domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking	
	services to foreign banks?	Please select
19 a1e	Does the Entity allow downstream relationships	
	with foreign banks?	Please select
10 -11		
19 a1f	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	Please select
	foreign banks?	
19 a1g	Does the Entity offer Correspondent Banking	
	services to regulated Money Services Businesses	Places select
	(MSBs)/Money Value Transfer Services (MVTSs)?	Please select
19 a1h	Does the Entity allow downstream relationships	The second s
	with MSBs, MVTSs, or Payment Service Provider	
	(PSPs)?	
10 a 1h4	MSBs	Otherse select
19 a1h1		Please select
19 a1h2	MVTSs	Please select
19 a1h3	PSPs	Please select

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	Please select
19 b	Cross-Border Bulk Cash Delivery	Please select
19 c	Cross-Border Remittances	No
19 d	Domestic Bulk Cash Delivery	Please select
19 e	Hold Mail	No
19 f	International Cash Letter	No
19 g	Low Price Securities	Please select
19 h	Payable Through Accounts	Please select
191	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	Please select
19 13	Virtual Asset Service Providers (VASPs)	Please select
19 i4	eCommerce Platforms	Please select
19 i5	Other - Please explain	
19 J	Private Banking	No
19 k	Remote Deposit Capture (RDC)	Please select
191	Sponsoring Private ATMs	Please select
19 m	Stored Value Instruments	No
19 n	Trade Finance	Please select
19 o	Virtual Assets	Please select
19 р	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	Please select
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	Please select
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	Please select
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	No
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Banco Bilbao Vizcaya Argentaria S.A., Niederlassung Deutschland
21	If appropriate, provide any additional information/context to the answers in this section.	
	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 experience/expertise	Please select
22 b	Adverse Information Screening	Please select
22 c	Beneficial Ownership	Please select
22 d	Cash Reporting	Please select
22 e	CDD	Please select
22 f	EDD	Please select
22 g	Independent Testing	Please select
22 h	Periodic Review	Please select
221	Policies and Procedures	Please select
22 j	PEP Screening	Please select
22 k	Risk Assessment	Please select
221	Sanctions	Please select

22 m	Suspicious Activity Reporting	Please select
22 n	Training and Education	Please select
22 o	Transaction Monitoring	Please select
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.	Please select
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Please select
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Please select
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Please select
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Banco Bilbao Vizcaya Argentaria S.A., Niederlassung Deutschland
29	If appropriate, provide any additional information/context to the answers in this section.	
4. ANT	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Please select
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Please select
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Please select
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Please select
34	Is the Entity's ABC programme applicable to:	Please select
35	Does the Entity have a global ABC policy that:	The second se
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Please select
35 b	Includes enhanced requirements regarding interaction with public officials?	Please select
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Please select
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Please select
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Please select
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Please select
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?	Please select
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Please select
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Please select

40 b	Corruption risks associated with the countries and	
	industries in which the Entity does business, directly or through intermediaries	Please select
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Please select
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Please select
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Please select
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Please select
42	Does the Entity provide mandatory ABC training to:	the second of the second states of the second states of the second
42 a	Board and senior Committee Management	Please select
42 b	1st Line of Defence	Please select
42 c	2nd Line of Defence	Please select
42 d	3rd Line of Defence	Please select
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Please select
42 f	Non-employed workers as appropriate (contractors/consultants)	Please select
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Please select
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
5. AML. C	TF & SANCTIONS POLICIES & PROCEDURES	
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	Please select
46 b	Terrorist financing	Please select
46 c	Sanctions violations	Please select
47	Are the Entity's policies and procedures updated at least annually?	Please select
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	Please select
48 a1	If Y, does the Entity retain a record of the results?	Please select
48 b	EU Standards	Please select
48 b1	If Y, does the Entity retain a record of the results?	Please select
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Please select
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Please select
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Please select
49 d	Prohibit accounts/relationships with shell banks	Please select
49 e	Prohibit dealing with another entity that provides services to shell banks	Please select
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Please select
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	Please select
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Please select

49 i	Define the process for escalating financial crime risk	
	issues/potentially suspicious activity identified by employees	Please select
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Please select
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Please select
491	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Please select
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Please select
49 n	Outline the processes for the maintenance of internal "watchlists"	Please select
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Please select
51	Does the Entity have record retention procedures that comply with applicable laws?	Please select
51 a	If Y, what is the retention period?	Please select
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
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.	
	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
6. AML, C 54 54 a	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Please select
6. AML, C 54 54 a 54 b	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Please select Please select
6. AML, C 54 54 a 54 b 54 c	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Please select Please select
6. AML, C 54 54 a 54 b	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the	Please select
6. AML, C 54 54 a 54 b 54 c 54 d	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Please select Please select
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below;	Please select Please select Please select
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 b 55 c	TF & SANCTIONS RISK ASSESSMENT         Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:         Client         Product         Channel         Geography         Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:         Transaction Monitoring         Customer Due Diligence         PEP Identification	Please select Please select Please select Please select Please select
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d	TF & SANCTIONS RISK ASSESSMENT Does the Entify's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entify's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	Please select Please select Please select Please select Please select Please select
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 c 55 c 55 c 55 c	TF & SANCTIONS RISK ASSESSMENT         Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:         Client         Product         Channel         Geography         Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:         Transaction Monitoring         Customer Due Diligence         PEP Identification         Transaction Screening         Name Screening against Adverse Media/Negative News	Please select
6. AML, C 54 54 a 54 b 54 c 54 c 54 d 55 55 a 55 a 55 c 55 c 55 c 55 c 55 c 5	TF & SANCTIONS RISK ASSESSMENT         Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:         Client         Product         Channel         Geography         Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:         Transaction Monitoring         Customer Due Diligence         PEP Identification         Transaction Screening         Name Screening against Adverse Media/Negative News         Training and Education	Please select
6, AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c	TF & SANCTIONS RISK ASSESSMENT         Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:         Client         Product         Channel         Geography         Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:         Transaction Monitoring         Customer Due Diligence         PEP Identification         Transaction Screening         Name Screening against Adverse Media/Negative News         Training and Education         Governance	Please select
6. AML, C 54 54 a 54 b 54 c 55 d 55 a 55 a 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 h	TF & SANCTIONS RISK ASSESSMENT         Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:         Client         Product         Channel         Geography         Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:         Transaction Monitoring         Customer Due Diligence         PEP Identification         Transaction Screening         Name Screening against Adverse Media/Negative News         Training and Education	Please select
6. AML, C 54 54 a 54 b 54 c 54 d 55	TF & SANCTIONS RISK ASSESSMENT         Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:         Client         Product         Channel         Geography         Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:         Transaction Monitoring         Customer Due Diligence         PEP Identification         Transaction Screening         Name Screening against Adverse Media/Negative News         Training and Education         Governance         Management Information         Has the Entity's AML & CTF EWRA been completed	Please select
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 c 55 c 55 c 55 c 55 c 55 c 5	TF & SANCTIONS RISK ASSESSMENT         Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:         Client         Product         Channel         Geography         Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:         Transaction Monitoring         Customer Due Diligence         PEP Identification         Transaction Screening         Name Screening against Adverse Media/Negative News         Training and Education         Governance         Management Information         Has the Entity's AML & CTF EWRA been completed in the last 12 months?         If N, provide the date when the last AML & CTF	Please select
6. AML, C 54 54 a 54 b 54 c 55 d 55 a 55 b 55 c 55 d 55 c 55 f 55 f 55 f 55 f 56 a 56 a 57	TF & SANCTIONS RISK ASSESSMENT         Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:         Client         Product         Channel         Geography         Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:         Transaction Monitoring         Customer Due Diligence         PEP Identification         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.	Please select
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c	TF & SANCTIONS RISK ASSESSMENT         Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:         Client         Product         Channel         Geography         Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:         Transaction Monitoring         Customer Due Diligence         PEP Identification         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:	Please select
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 c 55 c 55 c 55 c 55 c 5	TF & SANCTIONS RISK ASSESSMENT         Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:         Client         Product         Channel         Geography         Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:         Transaction Monitoring         Customer Due Diligence         PEP Identification         Trainsaction 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	Please select
6. AML, C 54 54 a 54 b 54 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h 56 a 56 a 57 a 57 a 57 c 57 d	TF & SANCTIONS RISK ASSESSMENT         Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:         Client         Product         Channel         Geography         Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:         Transaction Monitoring         Customer Due Diligence         PEP Identification         Transaction Screening         Name Screening against Adverse Media/Negative News         Training and Education         Governance         Management Information         Has the Entity's AML & CTF EWRA been completed in the last 12 months?         If N, provide the date when the last AML & CTF         EWRA was completed.         Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:         Client         Product         Channel         Geography	Please select
6. AML, C 54 54 a 54 b 54 c 55 d 55 a 55 b 55 c 55 d 55 c 55 f 55 f 55 f 56 a 57 a 57 a 57 c 57 d 58	TF & SANCTIONS RISK ASSESSMENT         Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:         Client         Product         Channel         Geography         Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:         Transaction Monitoring         Customer Due Diligence         PEP Identification         Transaction Screening         Name Screening against Adverse Media/Negative News         Training and Education         Governance         Management Information         Has the Entity's AML & CTF EWRA been completed in the last 12 months?         If N, provide the date when the last AML & CTF EWRA was completed.         Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:         Client         Product         Channel         Geography         Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:         Client         Product         Channel         Geography         Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Please select
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 c 55 d 55 c 55 d 55 c 55 f 55 c 55 f 55 f 55 f 56 56 57 a 57 a 57 c 57 a 57 c 58 a 58 a 58 a 59 a 57 a 57 a 58 a 58 a 58 a 59 a 59 a 59 a 57 a 57 a 58 a 58 a 58 a 58 a 58 a 58 a 58 a 58 a 59	TF & SANCTIONS RISK ASSESSMENT         Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:         Client         Product         Channel         Geography         Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:         Transaction Monitoring         Customer Due Diligence         PEP Identification         Transaction Screening         Name Screening against Adverse Media/Negative News         Training and Education         Governance         Management Information         Has the Entity's AML & CTF EWRA been completed in the last 12 months?         If N, provide the date when the last AML & CTF EWRA was completed.         Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:         Client         Product         Channel         Geography         Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:         Client         Product         Channel         Geography         Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:         Cuistomer Due Diligence	Please select         Please select
6. AML, C 54 54 a 54 b 54 c 55 d 55 a 55 b 55 c 55 d 55 c 55 f 55 f 55 f 56 a 57 a 57 a 57 c 57 d 58	TF & SANCTIONS RISK ASSESSMENT         Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:         Client         Product         Channel         Geography         Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:         Transaction Monitoring         Customer Due Diligence         PEP Identification         Transaction Screening         Name Screening against Adverse Media/Negative News         Training and Education         Governance         Management Information         Has the Entity's AML & CTF EWRA been completed in the last 12 months?         If N, provide the date when the last AML & CTF EWRA was completed.         Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:         Client         Product         Channel         Geography         Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:         Client         Product         Channel         Geography         Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Please select

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

69 a3	Trigger event	Plassa salast
70	What is the method used by the Entity to screen for	Please select
	Adverse Media/Negative News?	Please select
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?	Please select
71 a	If Y, is this at:	
71 a1	Onboarding	Please select
71 a2	KYC renewal	Please select
71 a3	Trigger event	Please select
72	What is the method used by the Entity to screen PEPs?	Please select
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?	Please select
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Please select
74 a	If yes, select all that apply:	
74 a1	Less than one year	Please select
74 a2	1 – 2 years	Please select
74 a3	3 – 4 years	Please select
74 a4	5 years or more	Please select
74 a5	Trigger-based or perpetual monitoring reviews	Please select
74 a6	Other (Please specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Please select
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	Please select
76 b	Respondent Banks	Please select
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Please select
76 c	Embassies/Consulates	Please select
76 d	Extractive industries	Please select
76 e	Gambling customers	Please select
76 f	General Trading Companies	Please select
76 g	Marijuana-related Entities	
76 h	MSB/MVTS customers	Please select
0.0194.098		Please select
761	Non-account customers	Please select
76 j	Non-Government Organisations	Please select
76 k	Non-resident customers	Please select
76 I	Nuclear power	Please select
76 m	Payment Service Providers	Please select
76 n	PEPs	Please select
76 o	PEP Close Associates	Please select
76 p	PEP Related	Please select
76 q		Please select
76 r	Red light businesses/Adult entertainment	Please select
76 s		
76 t		Please select
	- Control Par	Please select
76 u		Please select
76 v		Please select
76 w		Please select
76 x 76 y	Virtual Asset Service Providers Other (specify)	Please select
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	Please select

78 a 79	If Y indicate who provides the approval: Does the Entity have specific procedures for onboarding entities that handle client money such as	Please select
	lawyers, accountants, consultants, real estate agents?	Please select
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Please select
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	Banco Bilbao Vizcaya Argentaria S.A., Niederlassung Deutschland
82	If appropriate, provide any additional information/context to the answers in this section.	Local procedure applicable as required
8. MONIT	DRING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Please select
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Please select
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?	Please select
34 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	
84 b2	When was the tool last updated?	Please select
34 b3	When was the automated Transaction Monitoring application last calibrated?	Please select
85	Does the Entity have regulatory requirements to report suspicious transactions?	Please select
35 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Please select
16	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Please select
7	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Please select
18	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Please select
9	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Please select
0	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
0 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
1	If appropriate, provide any additional information/context to the answers in this section.	
DAVMEN	IT TRANSPARENCY	
2	Does the Entity adhere to the Wolfsberg Group	
	Payment Transparency Standards?	Please select

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	Please select
93 b	Local Regulations	Please select
93 b1	If Y, specify the regulation	Predse select
93 c	lf N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Please select
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Please select
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Please select
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
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?	Please select
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)?	Please select
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?	Please select
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Please select
102	What is the method used by the Entity for sanctions screening?	Please select
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Please select
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)	Please select
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?	Please select
104	What is the method used by the Entity?	Please select

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Please select
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Please select
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Please select
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Please select
106 d	European Union Consolidated List (EU)	Please select
106 e	Lists maintained by other G7 member countries	Please select
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	Please select
107 b	Transactions	Please select
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?	Νσ
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Banco Bilbao Vizcaya Argentaria S.A., Niederlassung Deutschland
110	If appropriate, provide any additional information/context to the answers in this section.	
11. TRAIN	ING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to	
	government authorities	Please select
111 Б	government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Please select Please select
111 b 111 с	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant	
	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,	Please select
111 c	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	Please select Please select
111 c 111 d 111 e 111 f	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	Please select Please select Please select
111 c 111 d 111 e 111 f 112	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:	Please select Please select Please select Please select
111 c 111 d 111 e 111 f 112 112 a	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	Please select
111 c 111 d 111 e 111 f 112 112 a 112 b	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	Please select
111 c 111 d 111 e 111 f 112 112 a 112 b 112 c	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	Please select
111 c 111 d 111 e 111 f 112 112 a 112 b	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         3rd Line of Defence         Third parties to which specific FCC activities have	Please select Pl
1111 c 1111 d 1111 f 1112 1112 a 1112 b 1112 c 1112 c 1112 d 1112 e	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         3rd Line of Defence         Third parties to which specific FCC activities have been outsourced	Please select
111 c 111 d 111 f 112 112 a 112 b 112 c 112 c	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           1stLine 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	Please select Pl
1111 c 1111 d 1111 f 1112 112 a 112 b 112 c 112 c 112 c 112 c 112 f	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         1stLine 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	Please select Pl
1111 c 1111 d 1111 f 1112 a 1112 b 1112 c 1112 c 1112 c 1112 c 1112 f 1113	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         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,	Please select

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	In addition to BBVA Group trainings, Banco Bilbao Vizcaya Argentaria S.A., Niederlassung Deutschland provides regular onsite training to its staff in Germany.
and the second second	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)?	Please select
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the Independent Audit function)?	Please select
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
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?	Please select
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Please select
122 b	External Third Party	Please select
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	Please select
123 b	Enterprise Wide Risk Assessment	Please select
123 c 123 d	Governance	Please select
123 d	KYC/CDD/EDD and underlying methodologies Name Screening & List Management	Please select
123 f	Reporting/Metrics & Management Information	Please select Please select
123 g	Suspicious Activity Filing	Please select
123 h	Technology	Please select
123 i	Transaction Monitoring	Please select
123 j	Transaction Screening including for sanctions	Please select
123 k	Training & Education	Please select
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.	
4. FRAU		
127	Does the Entity have policies in place addressing fraud risk?	Please select
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Please select

129	Does the Entity have real time monitoring to detect fraud?	Please select
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?	Please select
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Please select
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.	c 0
Anti- Money <u>BBVA S.A.,</u> every effort t The Financia legal and reg The Financia standards. The Financia The Financia	Laundering, Chief Compliance Officer, Global Head of Financial Niederlassung Deutschland(Financial Instituti o remain in full compliance with all applicable financial crime laws Il Institution understands the critical importance of having effectiv ulatory obligations. I Institution recognises the importance of transparency regardin	on name) is fully committed to the fight against financial crime and makes s, regulations and standards in all of the jurisdictions in which it does business and holds accounts. we and sustainable controls to combat financial crime in order to protect its reputation and to meet its g parties to transactions in international payments and has adopted/is committed to adopting these y with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. ill be updated no less frequently than every eighteen months.
	in institution commits to me accurate supplemental information on	a lunialy basis.
Institution. I, <u>Marek Ki</u>	provided in this Wolfsberg CBDDQ are complete and correct to lian, Head of Compliance & AML Germany (MLRO or equi	f Correspondent Banking or equivalent), certify that I have read and understood this declaration, that my honest belief, and that I am authorised to execute this declaration on behalf of the Financial valent), certify that I have read and understood this declaration, that the answers provided in this m authorised to execute this declaration on behalf of the Financial Institution.
ancolei Niec	(Signature & Date (Signature &	») 2-5

# the Wolfsberg Group

Financial Institution Name: Location (Country) :

	No#	Question	Answer
1.	ENTITY	& OWNERSHIP	
1		Full Legal Name	
1		Tuli Legar Name	
2		Append a list of foreign branches which are covered	
		by this questionnaire	
3		Full Legal (Registered) Address	
_			
4		Full Primary Business Address (if different from	
		above)	
5		Date of Entity incorporation/establishment	
5		Bate of Entry moorporation/establishinent	
6		Select type of ownership and append an ownership	
		chart if available	
6 8	9	Publicly Traded (25% of shares publicly traded)	
		If Y, indicate the exchange traded on and ticker	
6	a I		
		symbol	
6	h	Member Owned/Mutual	
6		Government or State Owned by 25% or more	
6		Privately Owned	
6	a1	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	
-		shares	
		310103	
8		Does the Entity, or any of its branches, operate under	
		an Offshore Banking License (OBL)?	
8 ;	9	If Y, provide the name of the relevant branch/es	
-	-	which operate under an OBL	
9		Does the Bank have a Virtual Bank License or	
		provide services only through online channels?	
10	)	Name of primary financial regulator/supervisory	
		authority	
11		Provide Legal Entity Identifier (LEI) if available	
4.5			
12		Provide the full legal name of the ultimate parent (if	
		different from the Entity completing the DDQ)	

40	Installed a construction of the second second second states of	
13	Jurisdiction of licensing authority and regulator of	
	ultimate parent	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	
14 b	Private Banking	
14 c	Commercial Banking	
14 d	Transactional Banking	
	<u> </u>	
14 e	Investment Banking	
14 f	Financial Markets Trading	
	, and the second s	
14 g	Securities Services/Custody	
14 h	Broker/Dealer	
14 i	Multilateral Development Bank	
	•	
14 j	Wealth Management	
14 k	Other (please explain)	
14 K		
15	Does the Entity have a significant (10% or more)	
15		
	portfolio of non-resident customers or does it derive	
	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	where bank services are provided)	
1	. ,	
15 a	If Y, provide the top five countries where the non-	
15 4		
	resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	
16 b	Total Assets	
17	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches.	
17 a	If N algorify which guagations the difference (a relate to	
17 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
10		
18	If appropriate, provide any additional	
	information/context to the answers in this section.	
2. PRODUC	CTS & SERVICES	
19	Does the Entity offer the following products and	
	services:	
19 a	Correspondent Banking	
19 a1	IfY	
19 a1a	Does the Entity offer Correspondent Banking	
	services to domestic banks?	
19 a1b	Does the Entity allow domestic bank clients to	
1	provide downstream relationships?	
40.4		
19 a1c	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	
	domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking	
	services to foreign banks?	
L	Ĵ	
19 a1e	Does the Entity allow downstream relationships	
	with foreign banks?	
	<u> </u>	
19 a1f	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	
	foreign banks?	
19 a1g	Does the Entity offer Correspondent Banking	
Jany		
1	services to regulated Money Services Businesses	
1	(MSBs)/Money Value Transfer Services (MVTSs)?	
10 - 11		
19 a1h	Does the Entity allow downstream relationships	
	with MSBs, MVTSs, or Payment Service Provider	
	(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?	
19 b	Cross-Border Bulk Cash Delivery	
19 c	Cross-Border Remittances	
19 c 19 d	Domestic Bulk Cash Delivery	
19 e	Hold Mail	
19 f	International Cash Letter	
19 g	Low Price Securities	
19 h	Payable Through Accounts	
19 i	Payment services to non-bank entities who may	
101	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 m	Trade Finance	
19 0	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 p2a 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.	
	If you offer other services to walk-in customers please provide more detail here, including	
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by	
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above	
19 p5 19 q 20	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) 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	
19 p5 19 q 20 20 a 21	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) 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.	
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19 p5 19 q 20 20 a 21 3. AML, C1	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) 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. <b>F &amp; SANCTIONS PROGRAMME</b> Does the Entity have a programme that sets minimum	
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19 p5 19 p5 19 q 20 20 a 21 22 a 22 a 22 a 22 c 22 c	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) 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. <b>F &amp; SANCTIONS PROGRAMME</b> Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	
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19 p5 19 p5 19 q 20 a 20 a 21 a 22 a 22 a 22 b 22 c 22 d 22 c 22 d 22 c 22 d 22 g 22 h 22 i 22 j 22 k	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) 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. <b>F &amp; SANCTIONS PROGRAMME</b> Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment	
19 p5 19 p5 19 q 20 20 a 20 a 21 22 a 22 a 22 b 22 c 22 c 22 d 22 c 22 c 22 f 22 g 22 h 22 j 22 j	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) 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. <b>F &amp; SANCTIONS PROGRAMME</b> Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	

22 m	Suspicious Activity Reporting	
22 n	Training and Education	
22 o	Transaction Monitoring	
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	
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.	
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	
4. ANTI E	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	
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 experience/expertise responsible for coordinating the ABC programme?	
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	
34	Is the Entity's ABC programme applicable to:	
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	
35 b	Includes enhanced requirements regarding interaction with public officials?	
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	
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?	
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	

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 a 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	<b>F &amp; SANCTIONS POLICIES &amp; PROCEDURES</b>	
5. AML, CT 46	F & SANCTIONS POLICIES & PROCEDURES Has the Entity documented policies and 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 46 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering	
46 46 a 46 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing	
46 46 a 46 b 46 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations	
46 46 a 46 b 46 c 47	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually?	
46 46 a 46 b 46 c 47 48	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against:	
46 46 a 46 b 46 c 47 48 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results?	
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46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 a 48 b 48 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 48 b 48 b 49	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 48 b 48 b 49 49 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts	
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46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b 49 b 49 c 49 d	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 b 49 a 49 b 49 c 49 c 49 c 49 e	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 b 49 a 49 b 49 c 49 c 49 d 49 e 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 b 49 a 49 b 49 c 49 c 49 c 49 e	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents,	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 b 49 a 49 b 49 c 49 c 49 d 49 e 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 b 49 a 49 b 49 c 49 c 49 d 49 e 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de	

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 I	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	
	similar document which defines a risk boundary 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 means any ideal in the above	
32	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. AML. CTF	& SANCTIONS RISK ASSESSMENT	
6. AML, CTF 54	& SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	
54 54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	
54 a 54 b 54 c 54 d 55 55 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	
54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	
54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	
54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c 55 c 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	
54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	
54 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	
54         54 b         54 c         54 d         55 a         55 a         55 b         55 c         55 d         55 d         55 d         55 d         55 d         55 f         55 g         55 h         56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	
54 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed	
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54 54 a 54 b 54 c 55 a 55 a 55 b 55 c 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent	
54 54 a 54 b 54 c 54 d 55 a 55 a 55 c 55 c 55 d 55 c 55 d 55 c 55 f 55 f 55 h 56 a 57	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
54 54 a 54 b 54 c 54 d 55 a 55 a 55 c 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	
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54         54 a         54 b         54 c         55 a         55 b         55 c         55 c         55 d         55 c         55 d         55 f         55 g         55 h         56 a         57 c         57 d         58 a         58 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	
54         54 a         54 b         54 d         55 a         55 b         55 c         55 d         55 c         55 d         55 f         55 f         55 h         56         57         57 a         57 d         57 d         58         58 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	

58 e	Name Careening	
58 f	Name Screening	
58 f 58 g	Transaction Screening Training and Education	
58 g 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 Source of funds	
64 g 64 h	Source of runds 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 67 a3	Geography	
67 a3 67 a4	Business Type/Industry Legal Entity type	
67 a4	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 68 a4	Trigger event 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 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	5 years or more	
74 a5	Trigger-based or perpetual monitoring reviews	
74 a6	Other (Please 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	Virtual Asset Service Providers	
76 y	Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	

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	
01 a	and the branch/es that this applies to	
0.0		
82	If appropriate, provide any additional information/context to the answers in this section.	
8. MONITO	DRING & REPORTING	
83	Does the Entity have risk based policies, procedures	
	and monitoring processes for the identification and	
	reporting of suspicious activity?	
04	What is the method used by the Entity to monitor	
84	transactions for suspicious activities?	
<u> </u>		
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?	
04 62	When was the outemated Transaction Manitaring	
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	
05 a	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?	
	Deep the Entity have processes in place to reason it	
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.	
9. PAYME	NT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group	
1	Payment Transparency Standards?	

93	Does the Entity have policies, procedures and	
55		
	processes to comply with and have controls in place	
	to ensure compliance with:	
93 a	FATF Recommendation 16	
93 b	Local Regulations	
93 b1	If Y, specify the regulation	
55 51		
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	
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 beneficiary address including country in cross 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	
100 u	Sanctions List (UN)	
106 b	United States Department of the Treasury's Office of	
	Foreign Assets Control (OFAC)	
106 c	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	
101	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	
107 5		
100	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	
100	Section are representative of all the LE's branches	
100		
109 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
110	lf an ann aicte ann aide ann additional	
110	If appropriate, provide any additional	
	information/context to the answers in this section.	
	G & 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	
	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	
	2nd Line of Defence	
112 c		
112 d	3rd Line of Defence	
112 e	Third parties to which specific FCC activities have	
	been outsourced	
112 f	Non-employed workers (contractors/consultants)	
1121		
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	

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	14 · · · · · · · · · · · · · · · · · · ·	
116	If appropriate, provide any additional information/context to the answers in this section.	
12. QUALITY	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)?	
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	
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		
13. AUDII 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?	
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	
122 b	External Third Party	
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 123 d	Governance KYC/CDD/EDD and underlying methodologies	
123 u 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 123 k	Transaction Screening including for sanctions Training & Education	
123 I	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.	
14. FRAUD		
127	Does the Entity have policies in place addressing fraud risk?	
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	

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	ion Statement			
Wolfsberg G	roup Correspondent Banking Due Diligence Questionnaire 2023 (CE			
Declaration	Statement (To be signed by Global Head of Correspondent Bank	king 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 Institut	ion name) is fully committed to the fight against financial arises and makes		
every effort	(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 Financi standards.	The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these			
	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 Financi	al Institution commits to file accurate supplemental information or	n a timely basis.		
I,		of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that		
the answers Institution.	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		
I, Wolfsberg C		ivalent), certify that I have read and understood this declaration, that the answers provided in this am authorised to execute this declaration on behalf of the Financial Institution.		
	(Signature & Dat	e)		
	(Signature & Dat	e)		
1				



Assinado por: Jorge Manuel Canha Carvalho Luís Identificação: BIO7440544 Data: 2023-11-27 às 15:46:44 Local: LBEON Motivo: WOLFSBERG QUESTIONNAIRE BBVA PORTUGAL

# the Wolfsberg Group

Financial Institution Name: Banco Bilbao Vizcaya Argentaria, S.A. Shanghai Branch Location (Country) : China

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 Mead 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 atc.) 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	Banco Bilban Vizcaya Argentaria, S.A. Shanghai Branch
2	Append a list of foreign branches which are covered by this questionneire	BBVA Shanghei Brench
З	Full Legal (Registered) Address	4501,08 Jin Mao Tower,88 Century Boulevard, Shanghai 200121, China
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	16 Nov,2015
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Please select
6 a1	If Y, indicate the exchange traded on and licker symbol	
16 b	Member Owned/Mutual	Please select
6 c	Government or State Owned by 25% or more	Please select
6 d	Privately Owned	Please select
6 d1	If Y, provide details of shareholders or utimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	Please select
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Doos the Bank have a Virtual Bank License or provide services only through online channels?	Please select
10	Name of primary financial regulator/supervisory authority	National Administration of Financial Regulation People's Bank of China
11	Provide Legal Entity Identifier (LEI) if available	300300C1321131000022
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	

Idmate parent     Idmate parent       14     Stlect the business areas applicable to the Entry       74     Robit Banking       14     Product Stream (Entry)       14     Commercial Stream (Entry)       14     Commercial Stream (Entry)       14     Product Stream (Entry)       14     Product Stream (Entry)       14     Stream (Entry)       15     Does the Entry have applicant (ON or more)       16     Other (Please applicant (ON or more)       17     Does the Entry have applicant (ON or more)       18     Other (Please applicant (ON or more)       19     Does the Entry have applicant (ON or more)       19     Does the Entry have a stepficant (ON or more)       19     Stream (Stream (Entry) have a stepficant (ON or more)       19     Stream (Stream			
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14 e     Investment Bunking     No.       14 F     Financi Markets Triading     Prese select.       14 B     Securities ServiceSC/Usoby     No.       14 B     Securities ServiceSC/Usoby     No.       14 B     MultiBiand Development Bank     Prese select.       14 Weak Management     No.       15 Does the Entity have a significant (10% or more).     Prese select.       16 outboard of non-instifert clashores or close it Clarine     No.       17 Weak Management     No.       18 outboard of non-instifert clashores or close it Clarine     Prese select.       19 outboard of non-instifert clashores or close it Clarine     Prese select.       19 outboard of non-instifert clashores or close it Clarine     Prese select.       19 outboard of non-instifert clashores or close it Clarine     Prese select.       19 outboard of non-instifert clashores or close it Clarine     Prese select.       19 outboard of non-instifert clashores or close it Clarine     Prese select.       19 outboard of non-instifert clashores or close it Clarine     Prese select.       19 outboard or non-instifert clashores or class it Clarine     Prese select.       19 outboard or non-instifert clashores or class it Clarine     Prese select.       19 outboard or non-instifert clashores or class it Clarine     Prese select.       19 outboard or non-instifert clashores or class it Clarine     Prese select. <td>14 d</td> <td>Transactional Banking</td> <td>Please select</td>	14 d	Transactional Banking	Please select
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19 a11       Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?       Please select         19 b       Cross-Border Bulk Cash Delivery       Please select         19 c       Cross-Border Remittences       Please select         19 d       Domestic Bulk Cash Delivery       Please select         19 d       International Cash Letter       No         19 f       International Cash Letter       No         19 g       Low Price Securities       Please select         19 h       Payable Through Accounts       Please select         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?       No         19 i2       Third Party Payment Service Providers       Please select         19 i3       Virtual Asset Service Providers (VASPs)       Please select <th></th>	
MSBs /MVTSs/PSPs?       19 b     Cross-Border Bulk Cash Delivery     Please select       19 c     Cross-Border Remittances     Please select       19 d     Domestic Bulk Cash Delivery     Please select       19 e     Hold Mail     No       19 f     International Cash Letter     No       19 g     Low Price Securities     Please select       19 h     Payable Through Accounts     Please select       19 i     Payment services to non-bank entities who may then offer thrid party payment services to their customers?     No       19 i1     If Y, please select all that apply below?     Please select       19 i2     Third Party Payment Service Providers     Please select       19 i3     Virtual Assel Service Providers (VASPs)     Please select       19 i4     eCommerce Platforms     Please select	
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19 i3         Virtual Asset Service Providers (VASPs)         Please select           19 i4         eCommerce Platforms         Please select	
19 i4 eCommerce Platforms Please select	
19 i5 Other - Please explain	
19 j Private Banking No	
19 k Remote Deposit Capture (RDC) Please select	
191 Sponsoring Private ATMs Please select	
19 m Stored Value Instruments No	
19 n Trade Finance Please select	
19 o Virtual Assets Please select	
19 p For each of the following please stale whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1         Check cashing service         No           19 p1a         If yes, state the applicable level of due diligence         Please select	
19 p2 Wire transfers Please select	
19 p2a If yes, state the applicable level of due diligence Please select	· · · · · · · · · · · · · · · ·
19 p3 Foreign currency conversion Please select	
19 p3a If yes, state the applicable level of due diligence Please select	
19 p4 Sale of Monetary Instruments Please select	
19 p4a If yes, state the applicable level of due diligence Please select	
19 p5 If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	
19 q Other high-risk products and services identified by the Entity (please specify)	
20 Confirm that all responses provided in the above Section are representative of all the LE's branches. Please select	
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.	
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information/context to the answers in this section. 3. AML, CTF & SANCTIONS PROGRAMME	
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information/context to the answers in this section.         3. AML, CTF & SANCTIONS PROGRAMME         22       Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:         22 a       Appointed Officer with sufficient experience/expense	
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22 m	Suspicious Activity Reporting	Please select
22 n	Training and Education	Please select
22.0	Transaction Monitoring	Please select
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	1-10
24	Is the Enlity'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?	Please select
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Piesse select
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Please select
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	
4. ANTI	BRIBERY & CORRUPTION	l
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Please select
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Please select
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Please select
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Please select
34	is the Entity's ABC programme applicable to:	Please select
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Please select
35 Ь	Includes enhanced requirements regarding interaction with public officials?	Plezse select
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Plazse selact
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Please select
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Please select
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Please select
38 a	If N, provide the dale 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?	Please select
40	Does the Entity's ABC EWRA covor the inherent risk components detailed below;	Please select
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Please select
-		

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Please select
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Please select
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Piease select
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Piease salact
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Please saled
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Please select
42 5	1st Line of Defence	Please select
42 c	2nd Line of Defence	Please select
42 d	3rd Line of Defence	Please select
42 B	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Please select
42 f	Non-employed workers as appropriate (contractors/consultants)	Please select
43	Does the Entity provide ABC training that is largeled to specific roles, responsibilities and activities?	Please select
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
44 a	If N, clarify which questions the difference/s relate to and the branch/os that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
	CTF & SANCTIONS POLICIES & PROCEDURES	· · · · · · · · · · · · · · · · · · ·
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions rogulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Please select
46 b	Terrorist financing	Please select
46 c	Sanctions violations	Please select
47	Are the Entity's policies and procedures updated at least annually?	Please select
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	Please select
40 a 48 a1	If Y, does the Entity retain a record of the results?	Please select
48 b	EU Standards	Please select
48 b1	If Y, does the Entity retain a record of the results?	Please select
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Please select
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Please select
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Please select
49 d	Prohibit accounts/relationships with shell banks	Please select
49 e	Prohibit dealing with another entity that provides services to shell banks	Please select
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Please select
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	Please seleci
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Please select
1		

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

		L
58 e	Name Screening	Please select
58 f	Transaction Screening	Please select
58 g	Training and Education Has the Entity's Sanctions EWRA been completed in	Please select
59	the last 12 months?	Please salect
59 a	If N, provide the date when the last Sanctions	
5¥ 8	EWRA was completed.	
	Errich was completed.	
	Contraction that all accounts and the distribution of the second	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
60 a	If N, clarify which guestions the difference/s relate to	
	and the branch/es that this applies to.	
61	If appropriate, provide any additional	
<b>*</b> '	information/context to the answers in this section.	
7 KYC	CDD and EDD	
62	Does the Entity verify the identity of the customer?	Please select
63	Do the Entity's policies and procedures set out when	
	CDD must be completed, e.g. at the time of	Please select
1	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	Please select
64 b	Expected activity	Please select
64 c	Nature of business/employment	Please select
64 d	Ownership structure	Please select
64 e	Product usage	Please select
64 f	Purpose and nature of relationship	Please select
64 g	Source of funds	Please select
64 h	Source of wealth	Please select
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Please select
65 a 1	Are ultimate beneficial owners verified?	Please select
65 b	Authorised signatories (where applicable)	Please select
65 c	Key controllers	Please select
65 d	Other relevant parties	Please select
66	What is the Entity's minimum (lowest) threshold	Please select
	applied to beneficial ownership identification?	
67	Does the due diligence process result in customers	Please select
	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	Ptease select
67 a2 67 a3	Geography Business Type/Industry	Please select
67 a4	Legal Entity type	Please select Please select
67 a5	Adverse Information	Please select
67 a 6	Other (specify)	
68	For high risk non-individual customers, is a site visit a	
	part of your KYC process?	Please select
68 a	If Y, is this at	
68 a1	Onboarding	Please select
68 a2	KYC renewal	Please select
68 a3	Trigger event	Please select
68 a4	Other	Please select
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to	
1	screening customers for Adverse Media/Negative	Please select
	News?	
69 a	IFY, is this at	
69 a1	Onboarding	Please select
69 a2	KYC renewal	Please select
	"_i	

69 a3	Trigger event	Please select
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Please select
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?	Please select
71 a	If Y, is this at:	
71 a1	Onboarding	Please select
71 82	KYC renéwal	Please select
71 a3	Trigger event	Please select
72	What is the method used by the Entity to screen PEPs?	Please select
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?	Please select
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Please select
74 a	If yes, select all that apply:	
74 a 1	Less than one year	Yes
74 a2	1 – 2 years	Please select
74 a3	3 – 4 years	Please select
74 a4 74 a5	5 years or more	Please select
74 a5 74 a6	Trigger-based or perpetual monitoring reviews	Please select
74 86	Other (Please specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Please select
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	Please select
76 b	Respondent Banks	Please selact
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Please select
76 c	Embassies/Consulates	Please select
76 d	Extractive industries	Please select
76 e	Gambling customers	Please select
76 f	General Trading Companies	Please select
76 g	Marijuana-related Entities	Please select
76 h	MSB/MVTS customers	Please select
76 i	Non-account customers	Please select
76 j	Non-Government Organisations	Please select
76 k	Non-resident customers	Please select
761	Nuclear power	Please select
76 m	Payment Service Providers	Please select
76 n	PEPs	Please select
76 0	PEP Close Associates	Please select
76 p	PEP Related	Please select
	Precious metals and stones	
76 q		Please select
76 r	Red light businesses/Adult entertainment	Please select
76 s	Regulated charities	Please select
76 t	Shell banks	Please select
76 u	Travel and Tour Companies	Please select
76 V	Unregulated charities	Please select
76 w	Used Car Dealers	Please select
76 x 76 y	Virtual Asset Service Providers Other (specify)	Please select
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	Please select

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

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	Please select
93 b	Local Regulations	Please select
93 b†	If Y, specify the regulation	PRC AML LAW
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Please select
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Please select
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Please select
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
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	I
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?	Please select
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)?	Please select
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions laken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Please select
101	Does the Entity screen its customers, including beneficial ownership information callocted by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Please select
102	What is the method used by the Entity for sanctions screening?	Please select
102 a	If 'automated' or 'both automated' and manual' selected:	
102 a1 102 a1a	Are internal system of vendor-sourced tools used? If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/lool?	Please select
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)	Please select
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?	Please select
104	What is the method used by the Entity?	Please soloci

105		
	Does the Entity have a data quality management	
	programme to ensure that complete data for all	Please select
	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	Please select
	Sanctions List (UN)	
106 b	United States Department of the Treasury's Office of	Please select
	Foreign Assets Control (OFAC)	
106 c	Office of Financial Sanctions Implementation HMT	Please select
	(OFSI)	
106 dí	European Union Consolidated List (EU)	Please select
106 e	Lists maintained by other G7 member countries	Please select
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	Please select
107 b	Transactions	Please setect
108	Does the Entity have a physical presence, e.g.	
	branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC,	Pferra askat
	OFSI, EU or G7 member countries have enacted	Please select
	comprehensive jurisdiction-based Sanctions?	
109	Confirm that all responses provided in the above	······
193	Section are representative of all the LE's branches	Please select
109 a	If N, darify which guestions the difference/s relate to	
	and the branch/es that this applies to.	
110	If appropriate, provide any additional	
110	information/context to the answers in this section.	
	NG & EDUCATION	· · · · · · · · · · · · · · · · · · ·
111	Does the Entity provide mandatory training, which	r
	includes:	
	includes.	
111 a		
111 a	Identification and reporting of transactions to government authorities	Please select
111 а 111 b	Identification and reporting of transactions to	Please select
	Identification and reporting of transactions to government authorities	
	Identification and reporting of transactions to government authorities Examples of different forms of money laundering,	Please select
	Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant	
	Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant	Please select
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	
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.	Please select Please select
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	Please select
111 c 111 c 111 d 111 e	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	Please select Please select Please select Please select
111 c 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	Please select Please select Please select
111 c 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         Is the above mandatory training provided to;	Please select
111 c 111 c 111 d 111 e 111 f 112 112 a	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	Please select
111 b 111 c 111 d 111 e 111 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	Please select
111 b 111 c 111 d 111 e 111 f 112 112 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	Please select
111 b 111 c 111 d 111 <del>u</del> 111 <del>u</del> 112 a 112 b 112 c 112 c 112 d	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         1 st Line of Defence         3rd Line of Defence	Please select
111 b 111 c 111 d 111 e 111 f 112 112 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         1 st Line of Defence         3rd Line of Defence         3rd Line of Defence         Third parties to which specific FCC activities have	Please select
111 c 111 c 111 d 111 e 111 e 112 a 112 b 112 c 112 c 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         3rd Line of Defence         Third parties to which specific FCC activities have been outsourced	Please select
111 c 111 c 111 d 111 d 111 e 112 a 112 b 112 c 112 c 112 c 112 e 112 e 112 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         Fraud         Is the above mandatory training provided to;         Board and Senior Committee Management         1 st Line of Defence         3rd Line of Defence         Third parties to which specific FCC activities have been outsourced         Non-employed workers (contractors/consultants)	Please select
111 c 111 c 111 d 111 e 111 e 112 a 112 b 112 c 112 c 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         3rd 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	Please select
111 c 111 c 111 d 111 d 111 e 112 a 112 b 112 c 112 c 112 c 112 e 112 e 112 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         Fraud         Is the above mandatory training provided to:         Board and Senior Committee Management         1st 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 largeted to specific roles, responsibilities and	Please select
111 b 111 c 111 d 111 e 111 f 112 a 112 b 112 c 112 c 112 c 112 c 112 c 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         1 st 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 largeted to specific reles, responsibilities and high-risk products, services and activities?	Please select
111 c 111 c 111 d 111 d 111 e 112 a 112 b 112 c 112 c 112 c 112 e 112 e 112 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         Fraud         Is the above mandatory training provided to;         Board and Senior Committee Management         1 st Line of Defence         3rd 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 ANL, 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,	Please select
111 c 111 c 111 d 111 d 111 d 112 d 112 d 112 d 112 d 112 f 113 114	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         1 st Line of Defence         3rd 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 stall?	Please select         Please select
111 b 111 c 111 d 111 e 111 f 112 a 112 b 112 c 112 c 112 c 112 c 112 c 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         1 st Line of Defence         3rd 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 ANL, 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,	Please select

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional Information/context to the answers in this section.	
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)?	Please select
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Please select
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
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	Letter and the second s	
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?	Please select
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Please select
122 b	External Third Party	Please select
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	Please select
123 b	Enterprise Wide Risk Assessment	Please select
123 c	Governance	Please select
123 d	KYC/CDD/EDD and underlying methodologies	Please select
123 e 123 f	Name Screening & List Management Reporting/Metrics & Management Information	Please select Please select
123 g	Suspicious Activity Filing	Please select
123 h	Technology	Please select
123 i	Transaction Monitoring	Please select
123 j	Transaction Screening including for sanctions	Please select
123 K	Training & Education	Please select
1231	Other (specify)	
124	Are adverse findings from Internal & external audit tracked to completion and assessed for adequacy and completeness?	Please selact
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Please selaci
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
14, FRAU	JD <sup>in</sup> e se terre d'a tradici d'activité de la secola de la s	
127	Does the Entity have policies in place addressing fraud risk?	Please select
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Please select

129	Does the Entity have real time monitoring to detect	Please select	
	fraud?		
130	Do the Entily's processes include gathering additional information to support its fraud controls, for example; IP address, GPS location, and/or device ID?	Please select	
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Please selact	
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.		
Wolfsberg Gro Declaration S	on <u>Statement</u> up Correspondent Banking Due Diligence Questionnaire 2023 (Ci tatement (To be signed by Global Head of Correspondent Bani aundering, Chief Compliance Officer, Global Head of Financial	king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of	
BANCO BILE	BAO VIZCAYA ARGENTARIA S.A Shangh <b>e</b> i (Financial Institut	ion name) is fully committed to the fight against linancial crime and makes	
every effort to	premain in full compliance with all applicable financial crime law	s, 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 egal and regulatory obligations.		
The Financial standards.	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 The information	The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trado 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 or	n a timety basis,	
l, the answers   Institution,	(Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that he 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 nstitution.		
	Wenjie He (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this /dfsborg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.		
n=	(Signature & Da	te)	
Ure	Mostile 24 Nov Jor 3 (Signature & Date)		

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the Wolfsberg Group			
	Financial Institution Name: Location (Country) :	BBVA SA, NEW YORK BRANCH USA	
model are ma If a response	aterially similar to the LE Head Office. This questionnaire should not cover n	Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control nore 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. letails regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is d for that branch.	
No #	Question	Answer	
1. ENTIT	Y & OWNERSHIP		
1	Full Legal Name	BANCO BILBAO VIZCAYA ARGENTARIA S.A.	
2	Append a list of foreign branches which are covered by this questionnaire	BANCO BILBAO VIZCAYA ARGENTARIA S.A., NEW YORK BRANCH	
3	Full Legal (Registered) Address	1345 Avenue of the Americas, 44th Floor, New York, NY 10105, United States of America	
4	Full Primary Business Address (if different from above)		
5	Date of Entity incorporation/establishment	Licensed on Sept 17, 1990.	
6	Select type of ownership and append an ownership chart if available		
6 a	Publicly Traded (25% of shares publicly traded)	Yes	
6 a1	If Y, indicate the exchange traded on and ticker symbol	BBVA:SM Madrid, Barcelona, Bilbao, Valencia, London, Mexico, New York.	
6 b	Member Owned/Mutual	No	
6 C	Government or State Owned by 25% or more	No	
<u>6 d</u>	Privately Owned	No	
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 shares	0%	
8	Does the Entity, or any of its branches, operate under an	No	
8 a	Offshore Banking License (OBL)? If Y, provide the name of the relevant branch/es which operate under an OBL		
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	no	
10	Name of primary financial regulator/supervisory authority	New York State Department of Financial Services (NYDFS), and Federal Reserve Bank	
11	Provide Legal Entity Identifier (LEI) if available	K8MS7FD7N5Z2WQ51AZ71	

12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	
		None
13	Jurisdiction of licensing authority and regulator of	
	ultimate parent	
		SPAIN
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	No
14 b	Private Banking	No
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 C	Financial Markets Trading	Yes
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	
14 K		
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-	V
	resident means customers primarily resident in a	Yes
	different jurisdiction to the location where bank services	
	are provided)	
15 a	If Y, provide the top five countries where the non-resident	1. Peru
	customers are located.	2. Colombia
		3. Argentina
		4. Bermuda
		5. Mexico
16	Select the closest value:	
16 a	Number of employees	51-200
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section	No
	are representative of all the LE's branches.	
17 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	
		See BBVA Due Diligence for global branches of BBVA S.A.
18	If appropriate, provide any additional information/context	
	to the answers in this section.	
	CTS & 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	No
	domestic banks?	
19 a1b	Does the Entity allow domestic bank clients to provide	No
10 . 1	downstream relationships?	
19 a1c	Does the Entity have processes and procedures in place	Van
	to identify downstream relationships with domestic banks?	Yes
10 01 0		
19 a1d	Does the Entity offer Correspondent Banking services to	Yes
10 010	foreign banks?	
19 a1e	Does the Entity allow downstream relationships with	No
19 a1f	foreign banks? Does the Entity have processes and procedures in place	
19 411	to identify downstream relationships with foreign banks?	Yes
19 a1g	Does the Entity offer Correspondent Banking services to	
isaiy	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	MSPo	No
	MSBs	
19 a1h2	MVTSs	No
19 a1h3	MVTSs PSPs	No No
	MVTSs PSPs Does the Entity have processes and procedures in place	No
19 a1h3	MVTSs PSPs Does the Entity have processes and procedures in place to identify downstream relationships with MSBs	
19 a1h3 19 a1i	MVTSs PSPs Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	No Yes
19 a1h3	MVTSs PSPs Does the Entity have processes and procedures in place to identify downstream relationships with MSBs	No

40.1		N.
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	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	
191		
	offer third party payment services to their customers?	No
		No
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	
1315		
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No
19	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
19 p	For each of the following please state whether you offer	
19 h		
	the service to walk-in customers and if so, the applicable	
	level of due diligence:	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	
13 μ14		
19 p2	Wire transfers	No
	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	No
	If yes, state the applicable level of due diligence	
19 p3a		
19 p4	Sale of Monetary Instruments	No
	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.	
	ado angonoo.	
19 q	Other high-risk products and services identified by the	
	Entity (please specify)	
		FX Trading Third Party
		Demand Deposit Accounts (Checking, Savings)
20	Confirm that all responses provided in the above Section	
20		No
	are representative of all the LE's branches.	
20 a	If N, clarify which questions the difference/s relate to and	
20 a	In N, clarity which questions the unerence/s relate to and	
	the branch/es that this applies to.	
		See BBVA Due Diligence for global branches of BBVA S.A.
		See BbyA Due Diligence for global branches of BbyA S.A.
21	If appropriate, provide any additional information/context	
	to the answers in this section.	
2 AMI OT		
	F & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum	
-		
	AML, CTF and Sanctions standards regarding the	
	following components:	
22 a		
	Appointed Officer with sufficient experience/expertise	
22 b	Appointed Officer with sufficient experience/expertise	Yes
22.0	Adverse Information Screening	Yes
	Adverse Information Screening Beneficial Ownership	Yes Yes
22 c 22 d	Adverse Information Screening Beneficial Ownership	Yes Yes
22 d	Adverse Information Screening Beneficial Ownership Cash Reporting	Yes Yes Yes
22 d 22 e	Adverse Information Screening Beneficial Ownership Cash Reporting CDD	Yes Yes Yes Yes
22 d 22 e	Adverse Information Screening Beneficial Ownership Cash Reporting CDD	Yes Yes Yes Yes
22 d 22 e 22 f	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	Yes Yes Yes Yes Yes
22 d 22 e 22 f 22 g	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Yes Yes Yes Yes
22 d 22 e 22 f 22 g	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Yes Yes Yes Yes Yes Yes
22 d 22 e 22 f 22 g 22 h	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Yes Yes Yes Yes Yes Yes
22 d 22 e 22 f 22 g 22 h	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Yes Yes Yes Yes Yes Yes
22 d 22 e 22 f 22 g 22 h 22 h 22 i	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes Yes Yes Yes Yes Yes Yes Yes
22 d 22 e 22 f 22 g 22 h 22 h 22 i 22 j	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Yes Yes Yes Yes Yes Yes Yes Yes
22 d 22 e 22 f 22 g 22 h 22 h 22 i	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes Yes Yes Yes Yes Yes Yes Yes
22 d 22 e 22 f 22 g 22 h 22 h 22 i 22 i 22 j 22 k	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment	Yes Yes Yes Yes Yes Yes Yes Yes Yes
22 d 22 e 22 f 22 g 22 h 22 i 22 i 22 j 22 j 22 k 22 l	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
22 d 22 e 22 f 22 g 22 h 22 i 22 i 22 j 22 j 22 k 22 l	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
22 d 22 e 22 f 22 g 22 h 22 h 22 i 22 j 22 k 22 z 22 k 22 l 22 m	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions Suspicious Activity Reporting	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
22 d 22 e 22 f 22 g 22 h 22 i 22 i 22 j 22 j 22 k 22 l	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions Suspicious Activity Reporting Training and Education	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
22 d 22 e 22 f 22 g 22 h 22 h 22 j 22 k 22 j 22 k 22 l 22 k 22 l 22 m 22 n	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions Suspicious Activity Reporting Training and Education	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
22 d 22 e 22 f 22 g 22 h 22 i 22 i 22 j 22 k 22 j 22 k 22 j 22 k 22 g 22 m 22 n 22 o	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions Suspicious Activity Reporting Training and Education Transaction Monitoring	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
22 d 22 e 22 f 22 g 22 h 22 h 22 j 22 k 22 j 22 k 22 l 22 k 22 l 22 m 22 n	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions Suspicious Activity Reporting Training and Education Transaction Monitoring How many full time employees are in the Entity's AML,	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
22 d 22 e 22 f 22 g 22 h 22 i 22 i 22 j 22 k 22 j 22 k 22 j 22 k 22 g 22 m 22 n 22 o	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions Suspicious Activity Reporting Training and Education Transaction Monitoring How many full time employees are in the Entity's AML,	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
22 d 22 e 22 f 22 g 22 h 22 i 22 i 22 i 22 i 22 z 22 i 22 z 22 i 22 z 22 z	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions Suspicious Activity Reporting Training and Education Transaction Monitoring How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
22 d 22 e 22 f 22 g 22 h 22 i 22 i 22 j 22 k 22 j 22 k 22 i 22 k 22 n 22 n 22 o	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions Suspicious Activity Reporting Training and Education Transaction Monitoring How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? Is the Entity's AML, CTF & Sanctions policy approved at	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
22 d 22 e 22 f 22 g 22 h 22 i 22 i 22 i 22 z 22 i 22 z 22 i 22 z 22 z	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions Suspicious Activity Reporting Training and Education Transaction Monitoring How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? Is the Entity's AML, CTF & Sanctions policy approved at	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
22 d 22 e 22 f 22 g 22 h 22 i 22 i 22 i 22 z 22 i 22 z 22 i 22 z 22 z	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions Suspicious Activity Reporting Training and Education Transaction Monitoring How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
22 d 22 e 22 f 22 g 22 h 22 i 22 i 22 i 22 z 22 i 22 z 22 i 22 z 22 z	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions Suspicious Activity Reporting Training and Education Transaction Monitoring How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? 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	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
22 d 22 e 22 f 22 g 22 h 22 i 22 i 22 i 22 z 22 i 22 z 22 i 22 z 22 z	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions Suspicious Activity Reporting Training and Education Transaction Monitoring How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior	Yes Yes Yes Yes Yes Yes Yes Yes Yes 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?	Yes
26 a	If Y, provide further details	Back Office real-time message and payment screening for Sanctions by team based in Madrid. AML and Sanctions BAU support by contractors based in U.S.
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	No
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	See BBVA Due Diligence for global branches of BBVA S.A.
29	If appropriate, provide any additional information/context to the answers in this section.	
4. ANTI BR	IBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
40 a	Potential liability created by intermediaries and other	Yes
40 b	third-party providers as appropriate 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	Yoo
	Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	No
42 f	Non-employed workers as appropriate (contractors/consultants)	Yes
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	Regarding question 42e, it should be noted that BBVA does not provide training to all non-employed workers but it does provide training to certain high-risk non-employed workers such as agents. BBVA requires all its third parties to certify their commitment to comply with all applicable anti-corruption laws.
5. AML, CT	F & 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. Standards	Yes
48 a1	If Y, does the Entity retain a record of the results?	Yes
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	Yes
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
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	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes
49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
49	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	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	No
	are representative of all the LE's branches	NC
	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	See BBVA Due Diligence for global branches of BBVA S.A.
		See Day Due Diligence for global branches of DDA G.A.
	If appropriate, provide any additional information/context	
	to the answers in this section.	
6. AML, CTF	& SANCTIONS RISK ASSESSMENT	
	Does the Entity's AML & CTF EWRA cover the inherent	
	risk components detailed below:	
	Client	Yes
	Product Channel	Yes Yes
	Geography	Yes
	Does the Entity's AML & CTF EWRA cover the controls	163
	effectiveness components detailed below:	
	Transaction Monitoring	Yes
	Customer Due Diligence	Yes
	PEP Identification	Yes
	Transaction Screening Name Screening against Adverse Media/Negative News	Yes Yes
	Training and Education	Yes
	Governance	Yes
	Management Information	Yes
56	Has the Entity's AML & CTF EWRA been completed in	Yes
	the last 12 months?	
56 a	If N, provide the date when the last AML & CTF EWRA was completed.	
	was completed.	
	Does the Entity's Sanctions EWRA cover the inherent	
	risk components detailed below:	
	Client Product	Yes Yes
	Channel	Yes
57 d	Geography	Yes
	Does the Entity's Sanctions EWRA cover the controls	
	effectiveness components detailed below:	
	Customer Due Diligence	Yes
58 b 58 c	Governance List Management	Yes Yes
58 d	Management Information	Yes
	Name Screening	Yes
	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the	Yes
50 0	last 12 months?	
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
	was completed.	
60	Confirm that all responses provided in the above Section	No
	are representative of all the LE's branches If N, clarify which questions the difference/s relate to and	
60 a	the branch/es that this applies to.	
		See BBVA Due Diligence for global branches of BBVA S.A.
61	If appropriate, provide any additional information/context	
	to the answers in this section.	
7. KYC, CD	D and EDD	
	Does the Entity verify the identity of the customer?	Yes
	Do the Entity's policies and procedures set out when	
	CDD must be completed, e.g. at the time of onboarding	Yes
	or within 30 days?	
	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
	Are ultimate beneficial owners verified?	
65 a1		Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied	10%
~7	to beneficial ownership identification?	
67	Does the due diligence process result in customers	Yes
67 -	receiving a risk classification? If Y, what factors/criteria are used to determine the	
67 a		
07 -4	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	
		We also use the duration of the relationship, the current activity/trading volume, and the sanctions screening
		risk.
68	For high risk non-individual customers, is a site visit a	Yes
<u> </u>	part of your KYC process?	
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4	Other	No
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes
	customers for Adverse Media/Negative News?	Yes
69 a	customers for Adverse Media/Negative News? If Y, is this at:	
69 69 a 69 a1 69 a2	customers for Adverse Media/Negative News? If Y, is this at: Onboarding	Yes
69 a 69 a1 69 a2	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal	Yes Yes
69 a 69 a1 69 a2 69 a3	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event	Yes Yes Yes
69 a 69 a1 69 a2 69 a3	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for	Yes Yes
69 a 69 a1 69 a2 69 a3 70	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News?	Yes Yes Yes
69 a 69 a1 69 a2 69 a3 70	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening	Yes Yes Yes Combination of automated and manual
69 a 69 a1 69 a2 69 a3 70	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether	Yes Yes Yes
69 a 69 a1 69 a2 69 a3 70 71	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes Yes Yes Combination of automated and manual
69 a 69 a1 69 a2 69 a3 70 71 71 a	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at:	Yes Yes Yes Combination of automated and manual Yes
69 a 69 a1 69 a2 69 a3 70 71 71 71 a 71 a	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding	Yes Yes Yes Combination of automated and manual Yes
69 a 69 a1 69 a2 69 a3 70 71 71 71 a 71 a1 71 a2	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal	Yes Yes Yes Combination of automated and manual Yes Yes Yes
69 a 69 a1 69 a2 69 a3 70 71 71 71 a 71 a1 71 a2 71 a3	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event	Yes Yes Yes Combination of automated and manual Yes
69 a 69 a1 69 a2 69 a3 70	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal	Yes Yes Combination of automated and manual Yes Yes Yes Yes
69 a 69 a1 69 a2 69 a3 70 71 71 71 a 71 a1 71 a2 71 a3	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event	Yes Yes Yes Combination of automated and manual Yes Yes Yes
69 a 69 a1 69 a2 69 a3 70 71 71 71 a 71 a1 71 a2 71 a3 72	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs?	Yes Yes Combination of automated and manual Yes Yes Yes Yes
69 a 69 a1 69 a2 69 a3 70 71 71 71 a 71 a1 71 a2 71 a3 72	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes	Yes Yes Combination of automated and manual Yes Yes Yes Yes Yes Combination of automated and manual
69 a 69 a1 69 a2 69 a3 70 71 71 71 a 71 a1 71 a2 71 a3 72	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening	Yes Yes Combination of automated and manual Yes Yes Yes Yes
69 a 69 a1 69 a2 69 a3 70 71 71 71 a 71 a1 71 a2 71 a3 72	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether	Yes Yes Combination of automated and manual Yes Yes Yes Yes Yes Combination of automated and manual
69 a 69 a1 69 a2 69 a3 70 71 71 71 a 71 a1 71 a2 71 a3 72 73	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes Yes Combination of automated and manual Yes Yes Yes Yes Yes Combination of automated and manual Yes
69 a 69 a1 69 a2 69 a3 70 71 71 71 a 71 a1 71 a2 71 a3	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk	Yes Yes Combination of automated and manual Yes Yes Yes Yes Yes Combination of automated and manual
69 a 69 a1 69 a2 69 a3 70 71 71 71 a 71 a1 71 a2 71 a3 72 73	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes Yes Combination of automated and manual Yes Yes Yes Yes Yes Combination of automated and manual Yes
69 a         69 a1         69 a2         69 a3         70         71         71 a         71 a1         71 a2         71 a3         72         73         74 a	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? If yes, select all that apply:	Yes Yes Yes Combination of automated and manual Yes Yes Yes Yes Combination of automated and manual Yes
69 a         69 a1         69 a2         69 a3         70         71         71 a1         71 a2         71 a3         72         73         74         74 a1	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? If yes, select all that apply: Less than one year	Yes Yes Combination of automated and manual Yes Yes Yes Yes Combination of automated and manual Yes Combination of automated and manual Yes
69 a         69 a1         69 a2         69 a3         70         71         71 a1         71 a2         71 a3         72         73         74 a         74 a1         74 a2	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? If yes, select all that apply: Less than one year 1 – 2 years	Yes Yes Yes Combination of automated and manual Yes Yes Yes Yes Combination of automated and manual Yes
69 a         69 a1         69 a2         69 a3         70         71         71 a1         71 a2         71 a3         72         73         74 a         74 a1         74 a3	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? If yes, select all that apply: Less than one year 1 - 2 years 3 - 4 years	Yes Yes Combination of automated and manual Yes Yes Yes Yes Combination of automated and manual Yes Combination of automated and manual Yes Yes
69 a         69 a1         69 a2         69 a3         70         71         71 a1         71 a2         71 a3         72         73         74         74 a1         74 a2         74 a3         74 a4	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? If yes, select all that apply: Less than one year 1 – 2 years 5 years or more	Yes Yes Combination of automated and manual Yes Yes Yes Yes Combination of automated and manual Yes Combination of automated and manual Yes No
69 a         69 a1         69 a2         69 a3         70         71         71 a         71 a1         71 a2         71 a3         72         73         74 a         74 a1         74 a3         74 a5	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? If yes, select all that apply: Less than one year 1 – 2 years 3 – 4 years 5 years or more Trigger-based or perpetual monitoring reviews	Yes Yes Combination of automated and manual Yes Yes Yes Yes Combination of automated and manual Yes Combination of automated and manual Yes Yes
69 a         69 a1         69 a2         69 a3         70         71         71 a1         71 a2         71 a3         72         73         74         74 a1         74 a2         74 a3         74 a4	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? If yes, select all that apply: Less than one year 1 – 2 years 5 years or more	Yes Yes Combination of automated and manual Yes Yes Yes Yes Combination of automated and manual Yes Combination of automated and manual Yes No
69 a         69 a1         69 a2         69 a3         70         71         71 a         71 a1         71 a2         71 a3         72         73         74 a         74 a1         74 a3         74 a5	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? If yes, select all that apply: Less than one year 1 – 2 years 3 – 4 years 5 years or more Trigger-based or perpetual monitoring reviews	Yes Yes Combination of automated and manual Yes Yes Yes Yes Combination of automated and manual Yes Combination of automated and manual Yes No
69 a         69 a1         69 a2         69 a3         70         71         71 a         71 a1         71 a2         71 a3         72         73         74 a         74 a1         74 a3         74 a5	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? If yes, select all that apply: Less than one year 1 – 2 years 3 – 4 years 5 years or more Trigger-based or perpetual monitoring reviews	Yes Yes Combination of automated and manual Yes Yes Yes Yes Yes Combination of automated and manual Yes Yes Yes Combination of automated and manual Yes No
69 a         69 a1         69 a2         69 a3         70         71         71 a         71 a1         71 a2         71 a3         72         73         74 a         74 a1         74 a3         74 a5	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? If yes, select all that apply: Less than one year 1 – 2 years 3 – 4 years 5 years or more Trigger-based or perpetual monitoring reviews	Yes Yes Combination of automated and manual Yes Yes Yes Yes Yes Combination of automated and manual Yes Yes Yes Combination of automated and manual Yes No
69 a         69 a1         69 a2         69 a3         70         71         71 a1         71 a2         71 a3         72         73         74 a         74 a1         74 a2         74 a3         74 a5         74 a6	customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? If yes, select all that apply: Less than one year 1 – 2 years 3 – 4 years 5 years or more Trigger-based or perpetual monitoring reviews Other (Please specify)	Yes Yes Combination of automated and manual Yes Yes Yes Yes Combination of automated and manual Yes Combination of automated and manual Yes No
69 a         69 a1         69 a2         69 a3         70         71         71 a         71 a1         71 a2         71 a3         72         73         74 a         74 a1         74 a3         74 a5	customers for Adverse Media/Negative News?         If Y, is this at:         Onboarding         KYC renewal         Trigger event         What is the method used by the Entity to screen for Adverse Media/Negative News?         Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?         If Y, is this at:         Onboarding         KYC renewal         Trigger event         What is the method used by the Entity to screen PEPs?         If Y, is this at:         Onboarding         KYC renewal         Trigger event         What is the method used by the Entity to screen PEPs?         If what is the method used by the Entity to screen PEPs?         Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?         Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?         If yes, select all that apply:         Less than one year         1 – 2 years         3 – 4 years         5 years or more         Trigger-based or perpetual monitoring reviews         Other (Please specify)	Yes Yes Combination of automated and manual Yes Yes Yes Yes Combination of automated and manual Yes Combination of automated and manual Yes No
69 a         69 a1         69 a2         69 a3         70         71         71 a1         71 a2         71 a3         72         73         74 a1         74 a2         74 a3         74 a4         74 a5         74 a6	customers for Adverse Media/Negative News?         If Y, is this at:         Onboarding         KYC renewal         Trigger event         What is the method used by the Entity to screen for Adverse Media/Negative News?         Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?         If Y, is this at:         Onboarding         KYC renewal         Trigger event         What is the method used by the Entity to screen PEPs?         Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?         Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?         If yes, select all that apply:         Less than one year         1 – 2 years         3 – 4 years         5 years or more         Trigger-based or perpetual monitoring reviews         Other (Please specify)	Yes Yes Yes Combination of automated and manual Yes Yes Yes Yes Yes Combination of automated and manual Yes Yes Yes Yes Yes No Yes Yes No Yes Yes No Yes
69 a         69 a1         69 a2         69 a3         70         71         71 a1         71 a2         71 a3         72         73         74 a         74 a1         74 a2         74 a3         74 a5         74 a6	customers for Adverse Media/Negative News?         If Y, is this at:         Onboarding         KYC renewal         Trigger event         What is the method used by the Entity to screen for Adverse Media/Negative News?         Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?         If Y, is this at:         Onboarding         KYC renewal         Trigger event         What is the method used by the Entity to screen PEPs?         Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?         Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?         If yes, select all that apply: Less than one year         1 – 2 years         3 – 4 years         5 years or more         Trigger-based or perpetual monitoring reviews         Other (Please specify)         Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?         From the list below, which categories of customers or	Yes Yes Yes Combination of automated and manual Yes Yes Yes Yes Yes Combination of automated and manual Yes Yes Yes Yes Yes No Yes Yes No Yes Yes No Yes
69 a         69 a1         69 a2         69 a3         70         71         71 a1         71 a2         71 a3         72         73         74 a1         74 a2         74 a3         74 a4         74 a5         74 a6	customers for Adverse Media/Negative News?         If Y, is this at:         Onboarding         KYC renewal         Trigger event         What is the method used by the Entity to screen for Adverse Media/Negative News?         Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?         If Y, is this at:         Onboarding         KYC renewal         Trigger event         What is the method used by the Entity to screen PEPs?         Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?         Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?         If yes, select all that apply:         Less than one year         1 – 2 years         3 – 4 years         5 years or more         Trigger-based or perpetual monitoring reviews         Other (Please specify)	Yes Yes Yes Combination of automated and manual Yes Yes Yes Yes Yes Combination of automated and manual Yes Yes Yes Yes Yes No Yes Yes No Yes Yes No Yes

76 .	Arma dafanaa militar	
76 a	Arms, defence, military	EDD on risk-based approach
76 b	Respondent Banks	EDD on risk-based approach
76 b1	If EDD or restricted, does the EDD assessment contain	
	the elements as set out in the Wolfsberg Correspondent	Yes
76 c	Banking Principles 2022? Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	EDD on risk-based approach
76 e	Gambling customers	EDD on risk-based approach
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	EDD on risk-based approach
76 i	Non-account customers	Prohibited
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	EDD on risk-based approach
76 1	Nuclear power	EDD on risk-based approach
76 m	Payment Service Providers	EDD on risk-based approach
76 n	PEPs	EDD on risk-based approach
76 o	PEP Close Associates	EDD on risk-based approach
76 p	PEP Related	EDD on risk-based approach
76 q	Precious metals and stones	EDD on risk-based approach
76 r	Red light businesses/Adult entertainment	Do not have this category of customer or industry
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v	Unregulated charities	Do not have this category of customer or industry
76 w	Used Car Dealers	Do not have this category of customer or industry
76 x	Virtual Asset Service Providers	Do not have this category of customer or industry
76 y	Other (specify)	
		EDD on risk-based approach
		Leb on nor based approach
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/or	Yes
	compliance approval?	
78 a	If Y indicate who provides the approval:	Compliance
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers,	
	accountants, consultants, real estate agents?	No
80	Does the Entity perform an additional control or quality	Yes
	review on clients subject to EDD?	
81	Confirm that all responses provided in the above Section	No
	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	
	the branchies that this applies to	See BBVA Due Diligence for global branches of BBVA S.A.
		See BBVA Due Diligence for global branches of BBVA S.A.
82	If appropriate, provide any additional information/context	
-	to the answers in this section.	
		The entities listed in 79 would be subjected to BBVA high-risk customer EDD and account maintainance
		processes.
8. MONIT	FORING & REPORTING	
83	Does the Entity have risk based policies, procedures and	
	monitoring processes for the identification and reporting	Yes
	of suspicious activity?	
84	What is the method used by the Entity to monitor	Combination of automated and manual
94.0	transactions for suspicious activities?	
84 a	If manual or combination selected, specify what type of transactions are monitored manually	
	Transactions are monitored manually	All activity have automated monitoring. Official checks and trade finance activities have additional
		manual monitoring.
84 b	If automated or combination selected, are internal	
	system or vendor-sourced tools used?	Both
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the	
	name of the vendor/tool?	
		Mantas Oracle
84 b2	When was the tool last updated?	
84 b3	When was the automated Transaction Monitoring	
	application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report	Yes
	suspicious transactions?	122

85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes	
	to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	See BBVA Due Diligence for global branches of BBVA S.A.
91	If appropriate, provide any additional information/context to the answers in this section.	
	T TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment	V
	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	Bank Secrecy Act (BSA) rule [31 CFR 103.33(g)] (also referred to as the Travel rule) in the U.S. requires banks to transmit certain information to other banks
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	See BBVA Due Diligence for global branches of BBVA S.A.
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANCT	IONS	l
98	Does the Entity have a Sanctions Policy approved by	
	management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes

100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border	Yes
	transactions?	
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?	Both Automated and 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?	Accuity Inc. and Lexis Nexis Risk Solutions
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Combination of automated and manual
105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
<u>106 e</u> 106 f	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
	Other (specify)	
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	Νο
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
109 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	See BBVA Due Diligence for global branches of BBVA S.A.
110	If appropriate, provide any additional information/context to the answers in this section.	
111	Does the Entity provide mandatory training, which	
111 a	includes: Identification and reporting of transactions to government	Yes
111 b	authorities Examples of different forms of money laundering,	
	terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes

444	Conduct and Culture	Yes
<u>111 e</u>	Conduct and Culture	
<u>111 f</u>	Fraud	Yes
112	Is the above mandatory training provided to :	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
	2nd Line of Defence	
<u>112 c</u>		Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been	No
	outsourced	
112 f	Non-employed workers (contractors/consultants)	Yes
113	Does the Entity provide AML, CTF & Sanctions training	
	that is targeted to specific roles, responsibilities and high	
	risk products, services and activities?	Yes
	Tisk producis, services and activities?	165
114	Does the Entity provide customised training for AML,	Yes
	CTF and Sanctions staff?	
114 a	If Y, how frequently is training delivered?	Other
115	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	No
115 a	If N, clarify which questions the difference/s relate to and	
115 d		
	the branch/es that this applies to.	
		See BBVA Due Diligence for global branches of BBVA S.A.
116	If appropriate, provide any additional information/context	
	to the answers in this section.	
	ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality	
	Assurance programme for financial crime (separate from	Yes
	the independent Audit function)?	
118	Does the Entity have a program wide risk based	
	Compliance Testing process (separate from the	Yes
	independent Audit function)?	
119	Confirm that all responses provided in the above Section	
113	are representative of all the LE's branches	No
119 a	If N, clarify which questions the difference/s relate to and	
119 a		
	the branch/es that this applies to.	
		See BBVA Due Diligence for global branches of BBVA S.A.
120	If appropriate, provide any additional information/context	
	to the answers in this section.	
13. AUDIT		
	1	
121	In addition to inspections by the government	
	supervisors/regulators, does the Entity have an internal	
	audit function, a testing function or other independent	Yes
	third party, or both, that assesses 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:	
400		
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Not Applicable
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	Yes
	procedures	
	Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes
	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 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123 I	Other (specify)	
124	Are adverse findings from internal & external audit	
	tracked to completion and assessed for adequacy and	Yes
	completeness?	

125	Confirm that all responses provided in the above section are representative of all the LE's branches	No
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	See BBVA Due Diligence for global branches of BBVA S.A.
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?	Yes
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes
129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	No
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	See BBVA Due Diligence for global branches of BBVA S.A.
132	If appropriate, provide any additional information/context to the answers in this section.	
Wolfsberg Gro Declaration Sta Chief Complian BBVA NE every effort to the The Financial I obligations. The Financial I provided in this	nce Officer, Global Head of Financial Crimes Compliance OR equence of the provided	g or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, uivalent) n name) is fully committed to the fight against financial crime and makes regulations and standards in all of the jurisdictions in which it does business and holds accounts. and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory parties to transactions in international payments and has adopted/is committed to adopting these standards. with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information ess frequently than every eighteen months.
The Financial I	Institution commits to file accurate supplemental information on a	a timely basis.
I, <u>Kris</u> complete and o	CBDDQ are complete and correct to my honest belief, and that I	Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in I am authorised to execute this declaration on behalf of the Financial Institution. alent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are his declaration on behalf of the Financial Institution.

## the Wolfsberg Group

Financial Institution Name: Location (Country) :

	No#	Question	Answer
1.	ENTITY	& OWNERSHIP	
1		Full Legal Name	
1		Tuli Legar Marile	
2		Append a list of foreign branches which are covered	
		by this questionnaire	
3		Full Legal (Registered) Address	
_			
4		Full Primary Business Address (if different from	
		above)	
5		Date of Entity incorporation/establishment	
5		Bate of Entry moorporation/establishinent	
6		Select type of ownership and append an ownership	
		chart if available	
6 8	9	Publicly Traded (25% of shares publicly traded)	
		If Y, indicate the exchange traded on and ticker	
6	a I		
		symbol	
6	h	Member Owned/Mutual	
6		Government or State Owned by 25% or more	
6		Privately Owned	
6	a1	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	
-		shares	
		310103	
8		Does the Entity, or any of its branches, operate under	
		an Offshore Banking License (OBL)?	
8 ;	9	If Y, provide the name of the relevant branch/es	
-	-	which operate under an OBL	
9		Does the Bank have a Virtual Bank License or	
		provide services only through online channels?	
10	)	Name of primary financial regulator/supervisory	
		authority	
11		Provide Legal Entity Identifier (LEI) if available	
4.5			
12		Provide the full legal name of the ultimate parent (if	
		different from the Entity completing the DDQ)	

40	Installed a construction of the second	
13	Jurisdiction of licensing authority and regulator of	
	ultimate parent	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	
14 b	Private Banking	
14 c	Commercial Banking	
14 d	Transactional Banking	
	<u> </u>	
14 e	Investment Banking	
14 f	Financial Markets Trading	
	, and the second s	
14 g	Securities Services/Custody	
14 h	Broker/Dealer	
14 i	Multilateral Development Bank	
	•	
14 j	Wealth Management	
14 k	Other (please explain)	
14 K		
15	Does the Entity have a significant (10% or more)	
15		
	portfolio of non-resident customers or does it derive	
	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	where bank services are provided)	
1	. ,	
15 a	If Y, provide the top five countries where the non-	
15 4		
	resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	
16 b	Total Assets	
17	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches.	
17 a	If N algorify which guagations the difference (a relate to	
17 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
10		
18	If appropriate, provide any additional	
	information/context to the answers in this section.	
2. PRODUC	CTS & SERVICES	
19	Does the Entity offer the following products and	
	services:	
19 a	Correspondent Banking	
19 a1	IfY	
19 a1a	Does the Entity offer Correspondent Banking	
	services to domestic banks?	
19 a1b	Does the Entity allow domestic bank clients to	
1	provide downstream relationships?	
40.4		
19 a1c	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	
	domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking	
	services to foreign banks?	
L	Ĵ	
19 a1e	Does the Entity allow downstream relationships	
	with foreign banks?	
	<u> </u>	
19 a1f	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	
	foreign banks?	
19 a1g	Does the Entity offer Correspondent Banking	
Jany		
1	services to regulated Money Services Businesses	
1	(MSBs)/Money Value Transfer Services (MVTSs)?	
10 - 11		
19 a1h	Does the Entity allow downstream relationships	
	with MSBs, MVTSs, or Payment Service Provider	
	(PSPs)?	
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?	
19 b	Cross-Border Bulk Cash Delivery	
19 c	Cross-Border Remittances	
19 c 19 d	Domestic Bulk Cash Delivery	
19 e	Hold Mail	
19 f	International Cash Letter	
19 g	Low Price Securities	
19 h	Payable Through Accounts	
19 i	Payment services to non-bank entities who may	
101	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 m	Trade Finance	
19 0	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 p2a 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.	
	If you offer other services to walk-in customers please provide more detail here, including	
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by	
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above	
19 p5 19 q 20	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) 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	
19 p5 19 q 20 20 a 21	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) 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.	
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19 p5 19 q 20 20 a 21 3. AML, C1	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) 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. <b>F &amp; SANCTIONS PROGRAMME</b> Does the Entity have a programme that sets minimum	
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19 p5 19 q 20 20 a 21 3. AML, C1 22	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) 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. <b>F &amp; SANCTIONS PROGRAMME</b> Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise	
19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 b	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) 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. <b>F &amp; SANCTIONS PROGRAMME</b> 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	
19 p5 19 p5 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) 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. <b>F &amp; SANCTIONS PROGRAMME</b> 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	
19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 c 22 d	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) 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. <b>F &amp; SANCTIONS PROGRAMME</b> 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	
19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 c 22 c 22 c 22 c 22 c	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) 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. <b>F &amp; SANCTIONS PROGRAMME</b> 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	
19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c 22 c 22 c 22 c 22 c 22 c 22 c 22 c	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) 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. <b>F &amp; SANCTIONS PROGRAMME</b> 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	
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19 p5 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c 22 c 22 c 22 c 22 c 22 c 22 d 22 c 22 d 22 c 22 d 22 c	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) 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. <b>F &amp; SANCTIONS PROGRAMME</b> 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	
19 p5 19 p5 19 q 20 20 a 21 22 a 22 a 22 a 22 c 22 c	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) 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. <b>F &amp; SANCTIONS PROGRAMME</b> Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	
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19 p5 19 p5 19 q 20 a 20 a 21 a 22 a 22 a 22 b 22 c 22 d 22 c 22 d 22 c 22 d 22 g 22 h 22 i 22 j 22 k	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) 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. <b>F &amp; SANCTIONS PROGRAMME</b> Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment	
19 p5 19 p5 19 q 20 20 a 20 a 21 22 a 22 a 22 b 22 c 22	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) 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. <b>F &amp; SANCTIONS PROGRAMME</b> Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	

22 m	Suspicious Activity Reporting	
22 n	Training and Education	
22 o	Transaction Monitoring	
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	
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.	
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	
4. ANTI E	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	
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 experience/expertise responsible for coordinating the ABC programme?	
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	
34	Is the Entity's ABC programme applicable to:	
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	
35 b	Includes enhanced requirements regarding interaction with public officials?	
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	
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?	
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	

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 a 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	<b>F &amp; SANCTIONS POLICIES &amp; PROCEDURES</b>	
5. AML, CT 46	F & SANCTIONS POLICIES & PROCEDURES Has the Entity documented policies and 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 46 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering	
46 46 a 46 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing	
46 46 a 46 b 46 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations	
46 46 a 46 b 46 c 47	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually?	
46 46 a 46 b 46 c 47 48	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against:	
46 46 a 46 b 46 c 47 48 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards	
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46 46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 b 49 a 49 b 49 c 49 c 49 c 49 e	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 b 49 a 49 b 49 c 49 c 49 d 49 e 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks	
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46 46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 b 49 a 49 b 49 c 49 c 49 d 49 e 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 b 49 a 49 b 49 c 49 c 49 d 49 e 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de	

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 I	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	
	similar document which defines a risk boundary 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 means any ideal in the above	
32	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. AML. CTF	& SANCTIONS RISK ASSESSMENT	
6. AML, CTF 54	& SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	
54 54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	
54 a 54 b 54 c 54 d 55 55 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	
54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	
54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	
54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c 55 c 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	
54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	
54 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	
54         54 b         54 c         54 d         55 a         55 a         55 b         55 c         55 d         55 d         55 d         55 d         55 d         55 f         55 g         55 h         56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	
54 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed	
54         54 b         54 c         54 d         55 a         55 a         55 b         55 c         55 d         55 d         55 d         55 d         55 d         55 f         55 g         55 h         56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	
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54         54 a         54 b         54 c         54 d         55         55 b         55 c         55 d         55 c         55 d         55 d         55 d         55 f         55 g         55 h         56         57         57 a         57 c         57 d         58	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
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54         54 a         54 b         54 d         55 a         55 b         55 c         55 d         55 c         55 d         55 f         55 f         55 h         56         57         57 a         57 d         57 d         58         58 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	

59 0	Name Careening	
58 e 58 f	Name Screening	
58 f 58 g	Transaction Screening Training and Education	
58 g 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 Source of funds	
64 g 64 h	Source of runds 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 67 a3	Geography	
67 a3 67 a4	Business Type/Industry Legal Entity type	
67 a4	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 68 a4	Trigger event 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 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	5 years or more	
74 a5	Trigger-based or perpetual monitoring reviews	
74 a6	Other (Please 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 m 76 n	Payment Service Providers PEPs	
76 n 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	Virtual Asset Service Providers	
76 y	Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	

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	
014	and the branch/es that this applies to	
0.0		
82	If appropriate, provide any additional information/context to the answers in this section.	
8. MONITO	DRING & REPORTING	
83	Does the Entity have risk based policies, procedures	
	and monitoring processes for the identification and	
	reporting of suspicious activity?	
04	What is the method used by the Entity to monitor	
84	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?	
	system of 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?	
0440	When weathe automated Transaction Manitaring	
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	
05 a	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?	
	Deep the Entity have proceeds in place to record	
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.	
9. PAYME	NT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group	
	Payment Transparency Standards?	

93	Does the Entity have policies, procedures and	
55		
	processes to comply with and have controls in place	
	to ensure compliance with:	
93 a	FATF Recommendation 16	
93 b	Local Regulations	
93 b1	If Y, specify the regulation	
55 51		
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	
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 beneficiary address including country in cross 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	
100 u	Sanctions List (UN)	
	. ,	
106 b	United States Department of the Treasury's Office of	
	Foreign Assets Control (OFAC)	
106 c	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	
101	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	
107 5		
100	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	
100 -		
109 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
110	lf annuanista mussida anu additional	
110	If appropriate, provide any additional	
	information/context to the answers in this section.	
	G & EDUCATION	
111	Does the Entity provide mandatory training, which	
	includes:	
111 a	Identification and reporting of transactions to	
111 a		
	Identification and reporting of transactions to government authorities	
111 a 111 b	Identification and reporting of transactions to government authorities Examples of different forms of money laundering,	
	Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant	
	Identification and reporting of transactions to government authorities Examples of different forms of money laundering,	
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	
111 b	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	
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	
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	
111 b 111 c 111 d	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	
111 b 111 c 111 d 111 e	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	
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         Fraud	
111 b 111 c 111 d 111 e	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	
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         Fraud	
111 b 111 c 111 d 111 e 111 f 112 112 a	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	
111 b 111 c 111 d 111 e 111 f 112 112 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	
111 b 111 c 111 d 111 e 111 f 112 112 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	
111 b 111 c 111 d 111 e 111 f 112 112 a 112 b 112 c 112 d	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	
111 b 111 c 111 d 111 e 111 f 112 112 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         Third parties to which specific FCC activities have	
111 b 111 c 111 d 111 e 111 f 112 112 a 112 b 112 c 112 d	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	
111 b 111 c 111 d 111 e 111 f 112 a 112 a 112 b 112 c 112 d 112 e	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	
111 b 111 c 111 d 111 e 111 f 112 a 112 b 112 c 112 d 112 e 112 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 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)	
111 b 111 c 111 d 111 e 111 f 112 a 112 a 112 b 112 c 112 d 112 e	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	
111 b 111 c 111 d 111 e 111 f 112 a 112 b 112 c 112 d 112 e 112 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 Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st 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	
1111 b 1111 c 1111 c 1111 d 1112 112 a 112 b 112 c 112 d 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?	
111 b 111 c 111 d 111 e 111 f 112 a 112 b 112 c 112 d 112 e 112 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 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,	
1111 b 1111 c 1111 c 1111 d 1112 112 a 112 b 112 c 112 d 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?	
1111 b 1111 c 1111 c 1111 d 1112 112 a 112 b 112 c 112 d 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,	
111 b 111 c 111 c 111 d 111 e 111 f 112 a 112 b 112 c 112 d 112 c 112 d 112 c 112 f 113 114	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 high-risk products, services and activities? Does the Entity provide customised training for AML, CTF and Sanctions staff?	

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
12. QUALITY	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)?	
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	
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		
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?	
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	
122 b	External Third Party	
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 123 d	Governance KYC/CDD/EDD and underlying methodologies	
123 u 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 123 k	Transaction Screening including for sanctions	
123	Training & Education 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.	
14. FRAUD		
127	Does the Entity have policies in place addressing fraud risk?	
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	
	•	

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.		
Declaratio	on Statement		
Declaration S	oup Correspondent Banking Due Diligence Questionnaire 2023 (CE Statement (To be signed by Global Head of Correspondent Bank Laundering, Chief Compliance Officer, Global Head of Financial	ing or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of	
every effort t		on name) is fully committed to the fight against financial crime and makes s, regulations and standards in all of the jurisdictions in which it does business and holds accounts.	
	I Institution understands the critical importance of having effectivulatory obligations.	re and sustainable controls to combat financial crime in order to protect its reputation and to meet its	
The Financia standards.	I Institution recognises the importance of transparency regardin	g parties to transactions in international payments and has adopted/is committed to adopting these	
	I Institution further certifies it complies with / is working to compl ion provided in this Wolfsberg CBDDQ will be kept current and w	y with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. vill be updated no less frequently than every eighteen months.	
The Financia	I Institution commits to file accurate supplemental information on	a timely basis.	
I, the answers Institution.	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, Wolfsberg CI		valent), certify that I have read and understood this declaration, that the answers provided in this im authorised to execute this declaration on behalf of the Financial Institution.	
	(Signature & Dat	e)	
đ,	(Signature & Dat	e)	

## the Wolfsberg Group

Financial Institution Name: Location (Country) :

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	
•	i uli Legai Name	
2	Append a list of foreign branches which are covered	
-	by this questionnaire	
	by this questionnane	
3	Full Legal (Registered) Address	
4	Full Primary Business Address (if different from	
	above)	
	,	
5	Date of Entity incorporation/establishment	
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	
Uai	symbol	
	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		
1	% of the Entity's total shares composed of bearer	
	shares	
8	Does the Entity, or any of its branches, operate under	
8		
	an Offshore Banking License (OBL)?	
8 a	If Y, provide the name of the relevant branch/es	
	which operate under an OBL	
9	Does the Bank have a Virtual Bank License or	
	provide services only through online channels?	
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)	

40	Instaliation of line pairs and pairs and some later of	
13	Jurisdiction of licensing authority and regulator of	
	ultimate parent	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	
14 b	Private Banking	
14 c	Commercial Banking	
14 d	Transactional Banking	
	<u> </u>	
14 e	Investment Banking	
14 f	Financial Markets Trading	
	, and the second s	
14 g	Securities Services/Custody	
14 h	Broker/Dealer	
14 i	Multilateral Development Bank	
14 j	Wealth Management	
14 k	Other (please explain)	
14 K	Otilei (piease explain)	
15	Does the Entity have a significant (10% or more)	
1.2		
	portfolio of non-resident customers or does it derive	
1	more than 10% of its revenue from non-resident	
	customers? (Non-resident means customers primarily	
1	resident in a different jurisdiction to the location	
	where bank services are provided)	
15 a	If Y, provide the top five countries where the non-	
	resident customers are located.	
	resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	
16 b	Total Assets	
17	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches.	
17 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
18	If appropriate, provide any additional	
	information/context to the answers in this section.	
	information/context to the answers in this section.	
	CTS & SERVICES	
19	Does the Entity offer the following products and	
	services:	
40 -	O and a track B and in a	
19 a	Correspondent Banking	
19 a1	lf Y	
19 a1a	Does the Entity offer Correspondent Banking	
13 4 14		
	services to domestic banks?	
19 a1b	Does the Entity allow domestic bank clients to	
13 410	,	
	provide downstream relationships?	
19 a1c	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	
	domestic banks?	
10 01 -	Does the Entity offer Correspondent Banking	
19 a1d	, , , , , , , , , , , , , , , , , , , ,	
	services to foreign banks?	
19 a1e	Does the Entity allow downstream relationships	
13 416	, , , , , , , , , , , , , , , , , , , ,	
1	with foreign banks?	
19 a1f	Does the Entity have processes and procedures	
19 0 11		
1	in place to identify downstream relationships with	
	foreign banks?	
10 1		
19 a1g	Does the Entity offer Correspondent Banking	
	services to regulated Money Services Businesses	
	(MSBs)/Money Value Transfer Services (MVTSs)?	
	(woos)/woney value mansier services (WVTSS)?	
19 a1h	Does the Entity allow downstream relationships	
1	with MSBs, MVTSs, or Payment Service Provider	
1	(PSPs)?	
10 01-4	MSPa	
19 a1h1	MSBs	
19 a1h2	MVTSs	
19 a1h3		
119 8 1 1 3	PSPs	

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	
19 c	Cross-Border Remittances	
	Domestic Bulk Cash Delivery	
19 d		
19 e	Hold Mail	
19 f	International Cash Letter	
19 g	Low Price Securities	
19 h	Payable Through Accounts	
19 i	Payment services to non-bank entities who may	
	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)	
191	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	
	If yes, state the applicable level of due diligence	
19 p1a	Wire transfers	
19 p2		
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	
19 p3a	If yoo atota the applicable level of due diligence	
	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	
19 p4 19 p4a	Sale of Monetary Instruments If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	
19 p4 19 p4a	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including	
19 p4 19 p4a 19 p5	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by	
<u>19 p4</u> <u>19 p4a</u> <u>19 p5</u> <u>19 q</u>	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above	
<u>19 p4</u> <u>19 p4a</u> <u>19 p5</u> <u>19 q</u> <u>20</u>	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) 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	
19 p4         19 p4a         19 p5         19 q         20         20 a         21	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) 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.	
19 p4         19 p4a         19 p5         19 q         20         20 a         21	Sale of Monetary Instruments         If yes, state the applicable level of due diligence         If you offer other services to walk-in customers         please provide more detail here, including         describing the level of due diligence.         Other high-risk products and services identified by         the Entity (please specify)         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. <b>F &amp; SANCTIONS PROGRAMME</b> Does the Entity have a programme that sets minimum         AML, CTF and Sanctions standards regarding the	
19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C1	Sale of Monetary Instruments       If yes, state the applicable level of due diligence         If you offer other services to walk-in customers         please provide more detail here, including         describing the level of due diligence.         Other high-risk products and services identified by         the Entity (please specify)         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. <b>F &amp; SANCTIONS PROGRAMME</b> Does the Entity have a programme that sets minimum	
<u>19 p4</u> <u>19 p4a</u> <u>19 p5</u> <u>19 q</u> <u>20 a</u> <u>20 a</u> <u>21 3. AML, CT</u> <u>22</u>	Sale of Monetary Instruments       If yes, state the applicable level of due diligence         If you offer other services to walk-in customers         please provide more detail here, including         describing the level of due diligence.         Other high-risk products and services identified by         the Entity (please specify)         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. <b>F &amp; SANCTIONS PROGRAMME</b> Does the Entity have a programme that sets minimum         AML, CTF and Sanctions standards regarding the         following components:	
19 p4         19 p4a         19 p5         19 q         20         20 a         21         3. AML, C1         22         22 a	Sale of Monetary Instruments       If yes, state the applicable level of due diligence         If you offer other services to walk-in customers         please provide more detail here, including         describing the level of due diligence.         Other high-risk products and services identified by         the Entity (please specify)         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.         F & 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	
19 p4         19 p4a         19 p5         19 q         20         20 a         21         3. AML, C1         22         22 a         22 b	Sale of Monetary Instruments         If yes, state the applicable level of due diligence         If you offer other services to walk-in customers         please provide more detail here, including         describing the level of due diligence.         Other high-risk products and services identified by         the Entity (please specify)         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. <b>F &amp; SANCTIONS PROGRAMME</b> Does the Entity have a programme that sets minimum         AML, CTF and Sanctions standards regarding the         following components:         Appointed Officer with sufficient experience/expertise	
19 p4         19 p4a         19 p5         19 q         20         20 a         21         3. AML, C1         22         22 a         22 b         22 c	Sale of Monetary Instruments         If yes, state the applicable level of due diligence         If you offer other services to walk-in customers         please provide more detail here, including         describing the level of due diligence.         Other high-risk products and services identified by         the Entity (please specify)         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.         FE & 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	
19 p4         19 p4a         19 p5         19 q         20         20 a         21         3. AML, C1         22         22 a         22 b         22 c         22 d	Sale of Monetary Instruments         If yes, state the applicable level of due diligence         If you offer other services to walk-in customers         please provide more detail here, including         describing the level of due diligence.         Other high-risk products and services identified by         the Entity (please specify)         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. <b>F &amp; SANCTIONS PROGRAMME</b> 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	
19 p4         19 p4a         19 p5         19 q         20         20 a         21         3. AML, C1         22         22 a         22 b         22 c         22 d         22 c         22 d         22 c         22 d         22 c         22 d         22 e	Sale of Monetary Instruments         If yes, state the applicable level of due diligence         If you offer other services to walk-in customers         please provide more detail here, including         describing the level of due diligence.         Other high-risk products and services identified by         the Entity (please specify)         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. <b>F &amp; SANCTIONS PROGRAMME</b> 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	
19 p4         19 p4a         19 p5         19 q         20         20 a         21         3. AML, C1         22         22 a         22 b         22 c         22 d	Sale of Monetary Instruments         If yes, state the applicable level of due diligence         If you offer other services to walk-in customers         please provide more detail here, including         describing the level of due diligence.         Other high-risk products and services identified by         the Entity (please specify)         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. <b>F &amp; SANCTIONS PROGRAMME</b> 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	
19 p4         19 p4a         19 p5         19 q         20         20 a         21         3. AML, C1         22         22 a         22 b         22 c         22 d         22 c         22 d         22 c         22 d         22 c         22 d         22 e	Sale of Monetary Instruments         If yes, state the applicable level of due diligence         If you offer other services to walk-in customers         please provide more detail here, including         describing the level of due diligence.         Other high-risk products and services identified by         the Entity (please specify)         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. <b>F &amp; SANCTIONS PROGRAMME</b> 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	
19 p4         19 p4a         19 p5         19 p5         20         20 a         20 a         21         3. AML, CT         22 a         22 b         22 c         22 b         22 c         22 d         22 e         22 f         22 g	Sale of Monetary Instruments         If yes, state the applicable level of due diligence         If you offer other services to walk-in customers         please provide more detail here, including         describing the level of due diligence.         Other high-risk products and services identified by         the Entity (please specify)         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. <b>F &amp; SANCTIONS PROGRAMME</b> 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	
19 p4         19 p4a         19 p5         19 q         20         20 a         21         3. AML, CT         22 a         22 b         22 c         22 d         22 e         22 g         22 h	Sale of Monetary Instruments       If yes, state the applicable level of due diligence         If you offer other services to walk-in customers         please provide more detail here, including         describing the level of due diligence.         Other high-risk products and services identified by         the Entity (please specify)         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. <b>F &amp; SANCTIONS PROGRAMME</b> 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	
19 p4         19 p4a         19 p5         19 q         20         20 a         20 a         21         3. AML, CT         22 a         22 b         22 c         22 d         22 e         22 g         22 h         22 i	Sale of Monetary Instruments       If yes, state the applicable level of due diligence         If you offer other services to walk-in customers         please provide more detail here, including         describing the level of due diligence.         Other high-risk products and services identified by         the Entity (please specify)         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. <b>F &amp; SANCTIONS PROGRAMME</b> Does the Entity have a programme that sets minimum         AML, CTF and Sanctions standards regarding the         following components:         Appointed Officer with sufficient experience/expertise         Adverse Information Screening         Beneficial Ownership         Cash Reporting         CDD         EDD         Independent Testing         Periodic Review         Policies and Procedures	
19 p4         19 p4a         19 p5         19 p5         20         20 a         20 a         20 a         22 a         22 b         22 c         22 d         22 e         22 g         22 g         22 h         22 i         22 j	Sale of Monetary Instruments       If yes, state the applicable level of due diligence         If you offer other services to walk-in customers         please provide more detail here, including         describing the level of due diligence.         Other high-risk products and services identified by         the Entity (please specify)         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. <b>F &amp; SANCTIONS PROGRAMME</b> 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         Independent Testing         Periodic Review         Policies and Procedures         PEP Screening	
19 p4         19 p4a         19 p5         19 p5         20         20 a         20 a         21         22 a         22 b         22 c         22 d         22 e         22 f         22 g         22 h         22 i         22 k	Sale of Monetary Instruments       If yes, state the applicable level of due diligence         If you offer other services to walk-in customers         please provide more detail here, including         describing the level of due diligence.         Other high-risk products and services identified by         the Entity (please specify)         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. <b>F &amp; SANCTIONS PROGRAMME</b> Does the Entity have a programme that sets minimum         AML, CTF and Sanctions standards regarding the         following components:         Appointed Officer with sufficient experience/expertise         Adverse Information Screening         Beneficial Ownership         Cash Reporting         CDD         EDD         Independent Testing         Periodic Review         Policies and Procedures         PEP Screening         Risk Assessment	
19 p4         19 p4a         19 p5         19 p5         20         20 a         20 a         21         22 a         22 b         22 c         22 d         22 e         22 f         22 g         22 h         22 z         22 d         22 g         22 i         22 z         22 j	Sale of Monetary Instruments       If yes, state the applicable level of due diligence         If you offer other services to walk-in customers         please provide more detail here, including         describing the level of due diligence.         Other high-risk products and services identified by         the Entity (please specify)         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. <b>F &amp; SANCTIONS PROGRAMME</b> 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         Independent Testing         Periodic Review         Policies and Procedures         PEP Screening	

22 m	Suspicious Activity Reporting	
22 n	Training and Education	
22 o	Transaction Monitoring	
23	How many full time employees are in the Entity's	
	AML, CTF & Sanctions Compliance Department?	
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.	
25	Does the Board receive, assess, and challenge	
	regular reporting on the status of the AML, CTF, &	
	Sanctions programme?	
26	Does the Entity use third parties to carry out any	
20	components of its AML, CTF & Sanctions programme?	
26 a		
20 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	
28	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches	
28 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
29	If appropriate, provide any additional	
	information/context to the answers in this section.	
4. ANTI B	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and	
	requirements to reasonably prevent, detect and	
	report bribery and corruption?	
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 experience/expertise	
	responsible for coordinating the ABC programme?	
33	Does the Entity have adequate staff with appropriate	
	levels of experience/expertise to implement the ABC	
	programme?	
34	Is the Entity's ABC programme applicable to:	
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This	
	includes promising, offering, giving, solicitation or	
	receiving of anything of value, directly or indirectly,	
	if improperly intended to influence action or obtain	
	an advantage.	
35 b	Includes enhanced requirements regarding	
	interaction with public officials?	
35 c	Includes a prohibition against the falsification of	
	books and records (this may be within the ABC policy	
	or any other policy applicable to the Legal Entity)?	
36	Does the Entity have controls in place to monitor the	
	effectiveness of their ABC programme?	
37	Does the Board receive, assess, and challenge regular	
	reporting on the status of the ABC programme?	
38	Has the Entity's ABC Enterprise Wide Risk Assessment	
	(EWRA) been completed in the last 12 months?	
38 a	If N. provide the date when the last ABC EWRA was	
00 0	completed.	
20	Doos the Entity have an APC residual risk ration that	
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		
40	Does the Entity's ABC EWRA cover the inherent risk	
40.0	components detailed below:	
40 a	Potential liability created by intermediaries and	
	other third-party providers as appropriate	

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 a 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	<b>F &amp; SANCTIONS POLICIES &amp; PROCEDURES</b>	
5. AML, CT 46	F & SANCTIONS POLICIES & PROCEDURES Has the Entity documented policies and 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 46 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering	
46 46 a 46 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing	
46 46 a 46 b 46 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations	
46 46 a 46 b 46 c 47	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually?	
46 46 a 46 b 46 c 47 48	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against:	
46 46 a 46 b 46 c 47 48 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results?	
46 46 a 46 b 46 c 47 48 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results?	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 a 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 a 48 b 48 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 48 b 48 b 49	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 48 b 48 b 49 49 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 49 b 49 b 49 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b 49 b 49 c 49 d	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 b 49 a 49 b 49 c 49 c 49 c 49 e	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 b 49 a 49 b 49 c 49 c 49 d 49 e 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks	
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46 46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 b 49 a 49 b 49 c 49 c 49 d 49 e 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 b 49 a 49 b 49 c 49 c 49 d 49 e 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de	

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 I	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	
	similar document which defines a risk boundary 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 means any ideal in the above	
32	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. AML. CTF	& SANCTIONS RISK ASSESSMENT	
6. AML, CTF 54	& SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	
54 54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	
54 a 54 b 54 c 54 d 55 55 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	
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58 e	Name Careening	
58 f	Name Screening	
58 f 58 g	Transaction Screening Training and Education	
58 g 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 Source of funds	
64 g 64 h	Source of runds 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 67 a3	Geography	
67 a3 67 a4	Business Type/Industry Legal Entity type	
67 a4	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 68 a4	Trigger event 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 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	5 years or more	
74 a5	Trigger-based or perpetual monitoring reviews	
74 a6	Other (Please 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	Virtual Asset Service Providers	
76 y	Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	

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	
01 a	and the branch/es that this applies to	
0.0		
82	If appropriate, provide any additional information/context to the answers in this section.	
8. MONITO	DRING & REPORTING	
83	Does the Entity have risk based policies, procedures	
	and monitoring processes for the identification and	
	reporting of suspicious activity?	
04	What is the method used by the Entity to monitor	
84	transactions for suspicious activities?	
<u> </u>		
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?	
04 62	When was the outemated Transaction Manitaring	
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	
05 a	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?	
	Deep the Entity have processes in place to reason it	
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.	
9. PAYME	NT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group	
1	Payment Transparency Standards?	

93	Does the Entity have policies, procedures and	
55		
	processes to comply with and have controls in place	
	to ensure compliance with:	
93 a	FATF Recommendation 16	
93 b	Local Regulations	
93 b1	If Y, specify the regulation	
55 51		
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	
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 beneficiary address including country in cross 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	
100 u	Sanctions List (UN)	
106 b	United States Department of the Treasury's Office of	
	Foreign Assets Control (OFAC)	
106 c	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	
101	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	
107 5		
100	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	
100	Section are representative of all the LE's branches	
100		
109 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
110	lf annun viete, mussiale en verdeltienel	
110	If appropriate, provide any additional	
	information/context to the answers in this section.	
	G & 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	
	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	
	2nd Line of Defence	
112 c		
112 d	3rd Line of Defence	
112 e	Third parties to which specific FCC activities have	
	been outsourced	
112 f	Non-employed workers (contractors/consultants)	
1121		
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	

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	14 · · · · · · · · · · · · · · · · · · ·	
116	If appropriate, provide any additional information/context to the answers in this section.	
12. QUALITY	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)?	
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	
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		
13. AUDII 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?	
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	
122 b	External Third Party	
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 123 d	Governance KYC/CDD/EDD and underlying methodologies	
123 u 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 123 k	Transaction Screening including for sanctions Training & Education	
123 I	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.	
14. FRAUD		
127	Does the Entity have policies in place addressing fraud risk?	
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	

129	Does the Entity have real time monitoring to detect	
130	fraud? Do the Entity's processes include gathering	
150	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.	
Declarat	ion Statement	
Wolfsberg G	roup Correspondent Banking Due Diligence Questionnaire 2023 (CE	DDQ V1.4)
	Statement (To be signed by Global Head of Correspondent Bank Laundering, Chief Compliance Officer, Global Head of Financial	ing or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of
Anti- Money		
	(Financial Instituti	on name) is fully committed to the fight against financial crime and makes
every effort		s, regulations and standards in all of the jurisdictions in which it does business and holds accounts.
	al Institution understands the critical importance of having effectivi gulatory obligations.	re and sustainable controls to combat financial crime in order to protect its reputation and to meet its
The Financi standards.	al Institution recognises the importance of transparency regardin	g parties to transactions in international payments and has adopted/is committed to adopting these
	al Institution further certifies it complies with / is working to compl tion provided in this Wolfsberg CBDDQ will be kept current and v	y with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. vill be updated no less frequently than every eighteen months.
The Financi	al Institution commits to file accurate supplemental information on	a timely basis.
I,		f Correspondent Banking or equivalent), certify that I have read and understood this declaration, that
the answers Institution.	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
	(MI PO or only	valent), certify that I have read and understood this declaration, that the answers provided in this
Wolfsberg C		m authorised to execute this declaration on behalf of the Financial Institution.
	Phan Could	
	(Signature & Dat	e)
	(Signature & Dat	e)
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L		

#### the Wolfsberg Group

Financial Institution Name: Location (Country) : Banco Bilbao Vizcaya Argentaria S.A Singapore branch

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	Banco Bilbao Vizcaya Argentaria S.A
2	Append a list of foreign branches which are covered by this questionnaire	Singapore branch
3	Full Legal (Registered) Address	80 Raffles Place, #55-02 UOB Plaza 1, Singapore 048624.
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	28/03/2006
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Please select
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	Please select
6 c	Government or State Owned by 25% or more	Please select
6 d	Privately Owned	Please select
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 shares	
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	Please select
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	Please select
10	Name of primary financial regulator/supervisory authority	Monetary Authority of Singapore
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)	
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13	Jurisdiction of licensing authority and regulator of ultimate parent	
14	Select the business areas applicable to the Entity	and a state of the second s
14 a	Retail Banking	No
14 b	Private Banking	No
14 c	Commercial Banking	Please select
14 d	Transactional Banking	
		Please select
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 j	Wealth Management	No
14 k	Other (please explain)	
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.	Hong Kong, Australia, Ireland, Saudi Arabia and Netherlands
16	Select the closest value:	
16 a	Number of employees	1-50
16 b	Total Assets	
20215-012		Greater than \$500 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Please select
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. PROD	UCTS & SERVICES	
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	No
19 a1	IfY	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	Please select
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	Please select
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Please select
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Please select
19 a1e	Does the Entity allow downstream relationships with foreign banks?	Please select
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Please select
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	Please select
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	Please select
19 a1h2	MVTSs	
	PSPs	Please select Please select
19 a1h3		

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

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49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Please select
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Please select
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Please select
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	Please select
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Please select
49 n	Outline the processes for the maintenance of internal "watchlists"	Please select
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Please select
51	Does the Entity have record retention procedures that comply with applicable laws?	Please select
51 a	If Y, what is the retention period?	Please select
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
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. AML, C1 54	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 a	Client	Please select
54 b	Product	Please select
54 c	Channel	Please select
54 d	Geography	Please select
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
55 a	Transaction Monitoring	Please select
55 b 55 c	Customer Due Diligence PEP Identification	Please select
55 d	Transaction Screening	Please select Please select
55 e	Name Screening against Adverse Media/Negative News	Please select
55 f	Training and Education	Please select
55 g	Governance	Please select
55 h	Management Information	Please select
56	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Please select
56 a	If N, provide the date when the last AML & CTF EWRA was completed.	
57	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
57 a	Client	Please select
57 b	Product	Please select
57 c	Channel	Please select
57 d	Geography	Please select
58	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
58 a	Customer Due Diligence	Please select
58 b	Governance	Please select
58 c	List Management	Please select
58 d	Management Information	Please select

58

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	Please select
19 b	Cross-Border Bulk Cash Delivery	Please select
19 c	Cross-Border Remittances	Please select
19 d	Domestic Bulk Cash Delivery	Please solect
19 e	Hold Mail	No
19 f	International Cash Letter	Please select
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19 g	Low Price Securities	Please select
19 h	Payable Through Accounts	Please select
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	Please select
19 i3	Virtual Asset Service Providers (VASPs)	Please select
19 i4	eCommerce Platforms	Please select
19 15	Other - Please explain	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	Please select
191	Sponsoring Private ATMs	Please select
19 m	Stored Value Instruments	No
19 n	Trade Finance	Please select
19 0	Virtual Assets	Please select
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	Please select
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	Please select
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	Please select
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	No Walk-in customers for BBVA Singapore branch
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.	Please select
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,	
	CTF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	Please select
22 b	Adverse Information Screening	Please select
22 c	Beneficial Ownership	Please select
22 d	Cash Reporting	Not applicable
22 e	CDD	Please select
22 f	EDD	Please select
441		
ADDING	Independent Lecting	Please select
22 g	Independent Testing	
ATCHENT	Periodic Review	Please select
22 g		
22 g 22 h	Periodic Review	Please select
22 g 22 h 22 i	Periodic Review Policies and Procedures	Please select Please select

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22 m	Suspicious Activity Reporting	Please select
22 n	Training and Education	Please select
22 0	Transaction Monitoring	
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	Please select 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.	Please select
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Please select
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Please select
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Please select
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	
3	TI BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Please select
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Please select
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Please select
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Please select
34	Is the Entity's ABC programme applicable to:	Please select
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Please select
35 b	Includes enhanced requirements regarding interaction with public officials?	Please select
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Please select
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Please select
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Please select
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?	Please select
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Please select
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Please select

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58 e	Name Screening	Please select
58 f	Transaction Screening	Please select
58 g	Training and Education	Please select
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Please select
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	Please select
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. (	DDD and EDD	
62	Does the Entity verify the identity of the customer?	Please select
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?	Please select
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Please select
64 b	Expected activity	Please select
64 c	Nature of business/employment	Please select
64 d	Ownership structure	Please select
64 e	Product usage	Please select
64 f	Purpose and nature of relationship	Please select
64 g	Source of funds	Please select
64 h	Source of wealth	Please select
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Please select
65 a1	Are ultimate beneficial owners verified?	Please select
65 b	Authorised signatories (where applicable)	Please select
65 c	Key controllers	Please select
65 d 66	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	Please select Please select
67	Does the due diligence process result in customers receiving a risk classification?	Please select
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Please select
67 a2	Geography	Please select
67 a3	Business Type/Industry	Please select
67 a4	Legal Entity type	Please select
67 a5	Adverse Information	Please select
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Please select
68 a	If Y, is this at:	
68 a1	Onboarding	Please select
68 a2	KYC renewal	Please select
68 a3	Trigger event	Please select
68 a4 68 a4a	Other If yes, please specify "Other"	Please select
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Please select
69 69 a	screening customers for Adverse Media/Negative	Please select
017425	screening customers for Adverse Media/Negative News?	Please select Please select

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

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	If Y indicate who provides the approval:	Please select
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Νο
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Please select
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
31 a	If N, clarify which questions the difference/s relate to and the branch/cs that this applies to	79 - Singapore branch is in to wholesale corporate banking activities and we do not have lawyers, accountants, consultants and real estate agents as customers.
32	If appropriate, provide any additional information/context to the answers in this section.	
B. MONITO	DRING & REPORTING	
33	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Please select
34	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	Trade Finance related transactions are monitored for suspicious activity by - subjecting the bills of lading to sample verification - monitoring the vessel voyage from port of loading unlil port of discharge - subjecting the counter party to pre-clearance process before accepting the transaction - screening of all relevant parties from the Trade documents
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Please select
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?	Please select
84 b3	When was the automated Transaction Monitoring application last calibrated?	Please select
85	Does the Entity have regulatory requirements to report suspicious transactions?	Please select
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Please select
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Please select
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Please select
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Please select
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Please select
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	<ol> <li>Combination of manual and automated is for name screening.</li> <li>Manual for identifying suspicious activities</li> </ol>
91	If appropriate, provide any additional information/context to the answers in this section.	
A Design of president of the contraction of	INT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Please select

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	Please select
93 b	Local Regulations	Please select
93 b1	If Y, specify the regulation	MAS Notice 626 - Paragraph 11
93 c	lf N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Please select
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Please select
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Please select
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
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.	
40.0410	TIONO	
10. SANC 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?	Please select
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)?	Please select
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?	Please select
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Please select
102	What is the method used by the Entity for sanctions screening?	Both Automated and Manual
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Please select
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)	Please select
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?	Please select
104	What is the method used by the Entity?	Please select

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105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Please select
06	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
06 a	Consolidated United Nations Security Council Sanctions List (UN)	Please select
06 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Please select
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Please select
06 d	European Union Consolidated List (EU)	Please select
06 e	Lists maintained by other G7 member countries	Please select
106 f	Other (specify)	MAS Alert List and Payment blocking under Gambling Control Act Order 2023
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	Please select
107 b	Transactions	Please select
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?	Please select
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
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.	
	ING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Please select
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Please select
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Please select
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Please select
111 e	Conduct and Culture	Please select
111 f	Fraud	Please select
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	Please select
112 b	1st Line of Defence	Please select
112 c	2nd Line of Defence	Please select
112 d	3rd Line of Defence	Please select
112 e	Third parties to which specific FCC activities have been outsourced	Please select
112 f	Non-employed workers (contractors/consultants)	Please select
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	9 Please select
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Please select
114 a	If Y, how frequently is training delivered?	Please select
115	Confirm that all responses provided in the above	
galitier.	Section are representative of all the LE's branches	Please select

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115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	Managements accurate any solution of	
110	If appropriate, provide any additional information/context to the answers in this section.	
12. QUALI	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based	
	Quality Assurance programme for financial crime (separate from the independent Audit function)?	Please select
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Please select
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
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?	Please select
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Please select
122 b	External Third Party	Please select
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	Please select
123 b	Enterprise Wide Risk Assessment	Please select
123 c 123 d	Governance KYC/CDD/EDD and underlying methodologies	Please select Please select
123 u 123 e	Name Screening & List Management	Please select
123 f	Reporting/Metrics & Management Information	Please select
123 g	Suspicious Activity Filing	Please select
123 h	Technology	Please select
123 i	Transaction Monitoring	Please select
123 j	Transaction Screening including for sanctions	Please select
123 k	Training & Education	Please select
1231	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. FRA	UD	
127	Does the Entity have policies in place addressing fraud risk?	Please select
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Please select

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129	Does the Entity have real time monitoring to detect fraud?	Please select
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?	Please select
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Please select
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.	
Wolfsberg C	tion Statement Group Correspondent Banking Due Diligence Questionnaire 2023 (C Statement (To be signed by Global Head of Correspondent Ban y Laundering, Chief Compliance Officer, Global Head of Financia	king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of
Banco Bilt	bao Vizcaya Argentaria S.A (Financial Institu	tion name) is fully committed to the fight against financial crime and makes
Construction and the construction		s, regulations and standards in all of the jurisdictions in which it does business and holds accounts. ive and sustainable controls to combat financial crime in order to protect its reputation and to meet its
legal and re	egulatory obligations.	
The Finance standards.		ng parties to transactions in international payments and has adopted/is committed to adopting these
The Financ The inform	ial Institution further certifies it complies with / is working to comp ation provided in this Wolfsberg CBDDQ will be kept current and	by with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. will be updated no less frequently than every eighteen months.
The Financ	cial Institution commits to file accurate supplemental information o	n a timely basis.
	a Savira (Global Head rs provided in this Wolfsberg CBDDQ are complete and correct t	of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that o my honest belief, and that I am authorised to execute this declaration on behalf of the Financial
I, <u>Viswar</u> Wolfsberg	CBDDQ are complete and correct to my honest belief, and that I	uivalent), certify that I have read and understood this declaration, that the answers provided in this am authorised to execute this declaration on behalf of the Financial Institution.
	Daniella SAVIRA 2024.01.15 16:56:11 +08'00' (Signature & Da	ite)
1.		ate)
	V- V /	



# the Wolfsberg Group

Financial Institution Name: BANCO BILBAO VIZCAYA ARGENTARIA SA Location (Country) : FRANCE

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 at the legal entry (very including 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	BANCO BILBAO VIZCAYA ARGENTARIA SA French Branch
2	Append a list of foreign branches which are covered by this questionnaire	French Branch
3	Full Legal (Registered) Address	29 Avenue de l'Opéra 75001 Paris - FRANCE
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	1902
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Please select
6 a1	If Y, indicate the exchange traded on and licker symbol	
6 b	Member Owned/Mutual	Please select
6 c	Government or State Owned by 25% or more	Please select
6 d	Privately Owned	Please select
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 shares	
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	Please select
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	Please select
10	Name of primary financial regulator/supervisory authority	Banque de France / ACPR (Autonité de Contrôle Prudentiel et de Résolution
11	Provide Legal Entity Identifier (LEI) if available	894500U247KEMA0HHP26
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	

40	I had all also sells and the desired set in the se	
13	Jurisdiction of licensing authority and regulator of	
	ultimate parent	
	and a star show the subsection of the	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	No
14 b	Private Banking	No
14 c	Commercial Banking	Please select
14 d	Transactional Banking	Please select
14 e	Investment Banking	
14 6 14 f		Please select
	Financial Markets Trading	Please select
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	Please select
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	
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	Please select
	customers? (Non-resident means customers primarily	Please select
	resident in a different jurisdiction to the location	
	where bank services are provided)	인생님은 그는 것이 같은 것은 것이 있는 것이 같이 많이 많이 많이 많이 많이 했다.
15 a	If Y, provide the top five countries where the non-	
	resident customers are located.	정말 승규가 같은 것은 것 같은 것을 가 같은 것 같은 것 같은 것 같이 있었다. 것
16	Select the closest value:	and the set of the set
16 a	Number of employees	51-200
16 b	Total Assets	Please select
17	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches.	Please select
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.	
	monnauchicontext to the answers in this section.	
2. PRODI	JCTS & SERVICES	
19	Does the Entity offer the following products and	
	services:	생활 승규는 친구가 가지 않는 것을 가지 않는 것은 것을 가지 않는 것이 없는 것이 없이 않 않 않이 않
19 a	Correspondent Banking	
19 a1	If Y	No
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	Please select
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	Please select
19 a1c	Does the Entity have processes and procedures	
	in place to identify downstream relationships with domestic banks?	Please select
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Please select
19 a1e	Does the Entity allow downstream relationships with foreign banks?	Please select
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with	Please select
	foreign banks?	
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	Please select
	(MSBs)/Money Value Transfer Services (MVTSs)?	Please select
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	Please select
19 a1h2	MVTSs	Please select
19 a1h3	PSPs	Please select
		I IUGS SUICA

19 a1i	Does the Entity have processes and procedures	
	in place to identify downstream relationships with MSBs /MVTSs/PSPs?	No
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Please select
19 d	Domestic Bulk Cash Delivery	Please select
19 e	Hold Mail	No
19 f	International Cash Letter	Please select
19 g	Low Price Securities	No
19 h	Payable Through Accounts	Please select
19 i	Payment services to non-bank entities who may	Please select
191	then offer third party payment services to their customers?	Νο
19 i1	If Y, please select all that apply below?	an a
19 i2	Third Party Payment Service Providers	Please select
19 i3	Virtual Asset Service Providers (VASPs)	Please select
19 i4	eCommerce Platforms	Please select
19 i5	Other - Please explain	
19 j	Private Banking	No
19 k	Remote Deposil Capture (RDC)	Please select
191	Sponsoring Private ATMs	Please select
19 m	Stored Value Instruments	No
19 n	Trade Finance	Please select
19 0	Virtual Assets	Please select
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	Please select
19 p2	Wire transfers	Please select
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p3	Foreign currency conversion	Please select
19 p3a	If yes, state the applicable level of due diligence	Please select
19 p4	Sale of Monetary Instruments	Please select
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)	
19 q 20		Please select
	the Entity (please specify) Confirm that all responses provided in the above	Please select
20	the Entity (please specify) 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	Please select
20 20 a 21 3. AML, C	the Entity (please specify) 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. TF & SANCTIONS PROGRAMME	Please select
20 20 a 21 3. AML, C 22	the Entity (please specify) 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. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	Please select:
20 20 a 21 3. AML, C	the Entity (please specify) 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. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the	Please select
20 20 a 21 3. AML, C 22 22 a 22 a 22 b	the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If & 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	Please select Please select
20 20 a 21 3. AML, C 22 22 a 22 a 22 b 22 c	the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If & 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	Please select Please select Please select Please select
20 20 a 21 3. AML, C 22 22 a 22 b 22 c 22 c 22 d	the Entity (please specify) 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. <b>TF &amp; SANCTIONS PROGRAMME</b> 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	Please select Please select Please select Not applicable
20 20 a 21 3. AML, C 22 22 a 22 b 22 c 22 c 22 c 22 c 22 c	the Entity (please specify) 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. <b>TF &amp; SANCTIONS PROGRAMME</b> 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	Please select Please select Please select Please select Please select Please select Not applicable Please select
20 20 a 21 3. AML, C 22 22 a 22 b 22 c 22 c 22 c 22 c 22 c	the Entity (please specify) 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. <b>TF &amp; SANCTIONS PROGRAMME</b> 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	Please select Please select Please select Not applicable
20 20 a 21 3. AML, C 22 22 22 a 22 b 22 c 22 c 22 d 22 c 22 d 22 c 22 d 22 c	the Entity (please specify) 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. <b>TF &amp; SANCTIONS PROGRAMME</b> 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	Please select Please select Please select Please select Please select Please select Not applicable Please select
20 20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 c 22 c 22 c 22 c 22 c 22 c	the Entity (please specify) 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. <b>TF &amp; SANCTIONS PROGRAMME</b> 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 CDD EDD EDD	Please select
20 20 a 21 3. AML, C 22 22 b 22 c 22 c 22 c 22 c 22 c 22 c 2	the Entity (please specify) 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. <b>TF &amp; SANCTIONS PROGRAMME</b> 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 Independent Testing Periodic Review	Please select Pl
20 20 a 21 3. AML, C 22 22 b 22 c 22 d 22 c 22 d 22 c 22 d 22 c 22 f 22 g 22 p 22 p 22 p 22 p 22 p	the Entity (please specify) 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. <b>TF &amp; SANCTIONS PROGRAMME</b> 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 Independent Testing Periodic Review Policies and Procedures	Please select Pl
20 20 a 21 3. AML, C 22 22 b 22 c 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 z 22 h 22 z 22 h	the Entity (please specify) 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. <b>TF &amp; SANCTIONS PROGRAMME</b> Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Please select
20 20 a 21 3. AML, C 22 22 b 22 c 22 d 22 c 22 d 22 c 22 d 22 c 22 f 22 g 22 p 22 p 22 p 22 p 22 p	the Entity (please specify) 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. <b>TF &amp; SANCTIONS PROGRAMME</b> 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 Independent Testing Periodic Review Policies and Procedures	Please select Pl

22 m	Suspicious Activity Reporting	Please select
22 n	Training and Education	Please select
22 0	Transaction Monitoring	Please select
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.	Please select
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Please select
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Please select
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Please select
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	
4. ANTI	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Please select
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Please select
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Please select
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Please select
34	Is the Entity's ABC programme applicable to:	Please select
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Please select
35 b	Includes enhanced requirements regarding interaction with public officials?	Please select
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Please select
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Please select
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Please select
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Please select
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?	Please select
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Please select
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Please select

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly	Please select
40 c	or through intermediaries Transactions, products or services, including those	
	that involve state-owned or state-controlled entities or public officials	Please select
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Please select
40 e	Changes in business activities that may materially increase the Entity's corruption risk	No
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Please select
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Please select
42 b	1st Line of Defence	Please select
42 c	2nd Line of Defence	Please select
42 d	3rd Line of Defence	Please select
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)	Νο
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Please select
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
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, 46	CTF & SANCTIONS POLICIES & PROCEDURES 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	Please select
46 b	Terrorist financing	Please select
46 c	Sanctions violations	Please select
47	Are the Entity's policies and procedures updated at least annually?	Please select
48	Has the Entity chosen to compare its policies and procedures against:	
48 a		
48 a1	U.S. Standards	Please select
	U.S. Standards If Y, does the Entity retain a record of the results?	Please select Please select
48 b		
48 b 48 b1	If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	Please select
48 b	If Y, does the Entity retain a record of the results? EU Standards	Please select Please select
48 b 48 b1 49 49 a	If Y, does the Entity retain a record of the results?         EU Standards         If Y, does the Entity retain a record of the results?         Does the Entity have policies and procedures that:         Prohibit the opening and keeping of anonymous and fictitious named accounts	Please select Please select
48 b 48 b1 49	If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Please select Please select Please select
48 b 48 b1 49 49 a	If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for	Please select Please select Please select Please select Please select
48 b 48 b1 49 49 a 49 a	If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide	Please select Please select Please select Please select Please select Please select
48 b 48 b1 49 49 a 49 b 49 c	If Y, does the Entity retain a record of the results?         EU Standards         If Y, does the Entity retain a record of the results?         Does the Entity have policies and procedures that:         Prohibit the opening and keeping of anonymous and fictitious named accounts         Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs         Prohibit dealing with other entities that provide banking services to unlicensed banks         Prohibit accounts/relationships with shell banks         Prohibit dealing with another entity that provides services to shell banks	Please select Please select Please select Please select Please select Please select
48 b 48 b1 49 49 a 49 b 49 c 49 d	If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides	Please select
48 b 48 b1 49 49 a 49 b 49 c 49 c 49 d 49 e	If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with nother entity that provides services to shell banks Prohibit opening and keeping of accounts for	Please select

49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Please select
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Please select
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Please select
491	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Please select
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Please select
49 n	Outline the processes for the maintenance of internal "watchlists"	Please select
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Please select
51	Does the Entity have record retention procedures that comply with applicable laws?	Please select
51 a	If Y, what is the retention period?	Please select
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
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.	
54	T & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 a	Client	Please select
54 b	Product	Please select
54 c	Channel	Please select
54 d 55	Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Please select
55 a	Transaction Monitoring	Please select
55 b	Customer Due Diligence	Please select
55 c	PEP Identification	Please select
55 d	Transaction Screening	Please select
55 e	Name Screening against Adverse Media/Negative News	Please select
55 f	Training and Education	Please select
55 g	Governance	Please select
55 h	Management Information	Please select
56	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Please select
56 a	If N, provide the date when the last AML & CTF EWRA was completed.	
57	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
57 a	Client	Please select
57 b	Product	Please select
57 c	Channel	Please select
57 d	Geography	Please select
58	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
58 a	Customer Due Diligence	Please select
58 b 58 c	Governance List Management	Please select
58 c 58 d		Please select
	Management Information	Please select

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

	F	
69 a3	Trigger event	Please select
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Please seleci
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 ai	Onboarding	Please select
71 a2	KYC renewal	Please select
71 a3	Trigger event	Please select
72	What is the method used by the Entity to screen PEPs?	Please select
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?	Piease select
74	is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Please soloct
74 <u>a</u>	If yes, select all that apply:	
74 a1	Less than one year	Please select
74 82	1 – 2 years	Please select
74 43	3 – 4 years	Please select
74 14	S years or more	Please select
74 a5	Trigger-based or perpetual monitoring reviews	Please select
74 a6 75	Other (Please specify) Does the Entity maintain and report metrics on current	
	and past periodic or trigger event due diligence reviews?	Please select
76	From the list below, which categories of customers or industries are subject to EDD end/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Do not have this category of customer or industry
76 b	Respondent Banks	Do not have this category of customer or industry
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Piease salect
76 c	Embassies/Consulates	Do not have this category of customer or industry
76 d	Extractive industries	No EDD/restriction or prohibition
76 e	Gambling customers	Do not have this category of customer or industry
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Do not have this category of customer or industry
76 h	MSB/MVTS customers	Do not have this category of customer or industry
76 i	Non-account customers	Do not have this category of customer or industry
76)	Non-Government Organisations	Do not have this category of customer or industry
76 k	Non-resident customers	Picase select
761	Nuclear power	Do not have this category of customer or industry
76 m	Payment Service Providers	Do not have this category of customer or industry
76 n	PEPs	Do not have this category of customer or industry
76 0	PEP Close Associates	Please select
76 p	PEP Related	Please select
76 q	Precious metals and stones	Do not have this category of customer or industry
76 r	Red light businesses/Adult entertainment	Do not have this calegory of customer or industry
76 s	Regulated charities	Do not have this category of customer or industry
76 t	Shell banks	Do not have this calegory of customer or industry
76 u	Travel and Tour Companies	Pisase select
76 v	Unregulated charities	Do not have this category of customer or industry
76 w	Used Car Dealers	Do not have this category of customer or industry
76 x	Virtual Asset Service Providers	Do not have this category of customer or industry
76 y	Other (specify)	A MAY MAY A MARKANY AL ANG MAY AN ANG MARKANYA AL INA MARKANYA
77	If restricted, provide details of the restriction	
ι.		

78 a	If Y indicate who provides the approval:	Please select
79	Does the Entity have specific procedures for	
E. C.	onboarding entities that handle client money such as	No
100	lawyers, accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or	
	quality review on clients subject to EDD?	Please select
	7	
81	Confirm that all responses provided in the above	Please select
	Section are representative of all the LE's branches	Flease soleck
81 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
I State		
2010		
82	If appropriate, provide any additional	We identify beneficial owners according to the requirements of French legislation.
C.I. Lobert	information/context to the answers in this section.	
100		
8. MONII	ORING & REPORTING	
83	Does the Entity have risk based policies, procedures	
	and monitoring processes for the identification and	Please select
800 S.M.	reporting of suspicious activity?	
	What is the method used by the Entity to monitor	
84	transactions for suspicious activities?	Please select
-		
84 a	If manual or combination selected, specify what	
2 (5 (1))	type of transactions are monitored manually	
NSST C X		
16.000		
	Management of the second	
046	If automated or combination selected, are internal	Please select
84 b	system or vendor-sourced tools used?	
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is	Deterred (MTC
04 01	the name of the vendor/tool?	Datamart / MTS
1		Sole in the second of the state of the second se
1122		
21.21.2		
84 b2	When was the tool last updated?	Other - Please explain (in Question 91)
04 02	When was the tool last updated i	Oulei - Flease explain (in Quescon er)
84 b3	When was the automated Transaction Monitoring	
04.05	application last calibrated?	Please select
	epp. cover, not constant -	
85	Does the Entity have regulatory requirements to	
00	report suspicious transactions?	Please select
85 a	If Y, does the Entity have policies, procedures and	
00 4	processes to comply with suspicious transaction	Please select
	reporting requirements?	
	roporting roducementer.	
20	Dave the Estituteus collision, exceedures and	
86	Does the Entity have policies, procedures and	Please select
De lui S	processes to review and escalate matters arising from	Please select
1	the monitoring of customer transactions and activity?	
87	Does the Entity have a data quality management	
2010	programme to ensure that complete data for all	Please select
	transactions are subject to monitoring?	
	Deve the Catile have an energy in along to managed	
88	Does the Entity have processes in place to respond	
	to Request For Information (RFIs) from other entities	Please select
The part of	in a timely manner?	The second s
89	Does the Entity have processes in place to send	
	Requests for Information (RFIs) to their customers in	Please select
1217	a timely manner?	
90	Confirm that all responses provided in the above	Please select
	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	
	A DESCRIPTION OF A DESC	
91	If appropriate, provide any additional	Tools are maintained and updated by from the parent Company
	information/context to the answers in this section.	
	<ul> <li>Testini none second della presi anti- titi</li> </ul>	
9 PAVAR	ENT TRANSPARENCY	
9. PATMI 92		
32	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Please select
	rayment Hansparency Standards?	

93	Does the Enlity have policies, procedures and	
93	processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Please select
93 b	Local Regulations	Please select
93 b1	If Y, specify the regulation	
93 c	lf N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Please select
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Please select
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Please select
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
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		
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?	Please select
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)?	Please select
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?	Please select
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Please select
102	What is the method used by the Entity for sanctions screening?	Please select
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Please select
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)	Please select
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?	Piease select
104	What is the method used by the Entity?	Please select

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Please select
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Please select
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Please select
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Please select
106 d	European Union Consolidated List (EU)	Please select
106 e	Lists maintained by other G7 member countries	Please select
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	Please select
107 b	Transactions	Please select
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?	Please select
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
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.	
	NG & EDUCATION	
111	Does the Entity provide mandatory training, which Includes:	
111 a	Identification and reporting of transactions to government authorities	Please select
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Please select
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Please select
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Please select
111 e	Conduct and Culture	Please select
111 f	Fraud	Please select
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	Please select
112 b	1st Line of Defence	Please select
112 c 112 d	2nd Line of Defence 3rd Line of Defence	Please select
112 a	Third parties to which specific FCC activities have been outsourced	Please select Please select
112 f	Non-employed workers (contractors/consultants)	Please select
113	Does the Enlity 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?	Please select
114 a	If Y, how frequently is training delivered?	Please select
115	Confirm that all responses provided in the above	Please select
	Section are representative of all the LE's branches	i hudo dolovi

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
12 0141	TY ASSURANCE (COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)?	Please select
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Please select
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
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?	Please select
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Please select
122 b	External Third Party	Please select
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	Please select
123 b	Enterprise Wide Risk Assessment	Please select
123 c 123 d	Governance KYC/CDD/EDD and underlying methodologies	Please select Please select
123 e	Name Screening & List Management	Please select
123 f	Reporting/Metrics & Management Information	Please select
123 g	Suspicious Activity Filing	Please select
123 h	Technology	Please select
123	Transaction Monitoring	Please select
123 j 123 k	Transaction Screening including for sanctions Training & Education	Please select Please select
1231	Other (specify)	r reaso solou
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		
127	Does the Entity have policies in place addressing fraud risk?	Please select
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Please select

129	Does the Entity have real time monitoring to detect fraud?	Please select
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?	Please select
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Please select
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.	
Anti- Money Banco Bilba every effort	Laundering, Chief Compliance Officer, Global Head of Financial ao Vizcaya Argentaria S.A (Financial Institut to remain in full compliance with all applicable financial crime law	king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Grimes Compliance OR equivalent) ion name) is fully committed to the fight against financial crime and makes s, regulations and standards in all of the jurisdictions in which it does business and holds accounts. we and sustainable controls to combat financial crime in order to protect its reputation and to meet its
legal and reg	gulatory obligations.	ng parties to transactions in international payments and has adopted/is committed to adopting these
	al Institution further certifies it complies with / is working to comp tion provided in this Wolfsberg CBDDQ will be kept current and v	y with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. will be updated no less frequently than every eighteen months.
The Financia	al Institution commits to file accurate supplemental information or	n a timely basis.
I, the answers Institution.		of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that my honest belief, and that I am authorised to execute this declaration on behalf of the Financial
Luis Lóc	ez González (MLRO or equ	ivalent), certify that I have read and understood this declaration, that the answers provided in this
		arm authorised to execute this declaration on behalf of the Financial Institution.
12/12/2023	3 Signature & Da	le)
	(Signature & Da	(e)
	(0900000000	
	and the second se	

# the Wolfsberg Group

Financial Institution Name: Location (Country) :

	No#	Question	Answer
1.	ENTITY	& OWNERSHIP	
1		Full Legal Name	
1		Tuli Legar Name	
2		Append a list of foreign branches which are covered	
		by this questionnaire	
3		Full Legal (Registered) Address	
_			
4		Full Primary Business Address (if different from	
		above)	
5		Date of Entity incorporation/establishment	
5		Bate of Entry moorporation/establishinent	
6		Select type of ownership and append an ownership	
		chart if available	
6 8	9	Publicly Traded (25% of shares publicly traded)	
		If Y, indicate the exchange traded on and ticker	
6	a I		
		symbol	
6	h	Member Owned/Mutual	
6		Government or State Owned by 25% or more	
6		Privately Owned	
6	a1	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	
-		shares	
		310103	
8		Does the Entity, or any of its branches, operate under	
		an Offshore Banking License (OBL)?	
8 ;	9	If Y, provide the name of the relevant branch/es	
-	-	which operate under an OBL	
9		Does the Bank have a Virtual Bank License or	
		provide services only through online channels?	
10	)	Name of primary financial regulator/supervisory	
		authority	
11		Provide Legal Entity Identifier (LEI) if available	
4.5			
12		Provide the full legal name of the ultimate parent (if	
		different from the Entity completing the DDQ)	

40	Installed a construction of the second second second states of	
13	Jurisdiction of licensing authority and regulator of	
	ultimate parent	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	
14 b	Private Banking	
14 c	Commercial Banking	
14 d	Transactional Banking	
	<u> </u>	
14 e	Investment Banking	
14 f	Financial Markets Trading	
	, and the second s	
14 g	Securities Services/Custody	
14 h	Broker/Dealer	
14 i	Multilateral Development Bank	
	•	
14 j	Wealth Management	
14 k	Other (please explain)	
14 K	Otilei (piease explain)	
15	Does the Entity have a significant (10% or more)	
15		
	portfolio of non-resident customers or does it derive	
	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	where bank services are provided)	
1	. ,	
15 a	If Y, provide the top five countries where the non-	
15 4		
	resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	
16 b	Total Assets	
17	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches.	
17 a	If N algorify which guagations the difference (a relate to	
17 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
10		
18	If appropriate, provide any additional	
	information/context to the answers in this section.	
2. PRODUC	CTS & SERVICES	
19	Does the Entity offer the following products and	
	services:	
19 a	Correspondent Banking	
19 a1	IfY	
19 a1a	Does the Entity offer Correspondent Banking	
	services to domestic banks?	
19 a1b	Does the Entity allow domestic bank clients to	
1	provide downstream relationships?	
40.4		
19 a1c	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	
	domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking	
	services to foreign banks?	
L	Ĵ	
19 a1e	Does the Entity allow downstream relationships	
	with foreign banks?	
	<u> </u>	
19 a1f	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	
	foreign banks?	
19 a1g	Does the Entity offer Correspondent Banking	
Jany		
1	services to regulated Money Services Businesses	
1	(MSBs)/Money Value Transfer Services (MVTSs)?	
10 - 11		
19 a1h	Does the Entity allow downstream relationships	
	with MSBs, MVTSs, or Payment Service Provider	
	(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?	
19 b	Cross-Border Bulk Cash Delivery	
19 c	Cross-Border Remittances	
19 c 19 d	Domestic Bulk Cash Delivery	
19 e	Hold Mail	
19 f	International Cash Letter	
19 g	Low Price Securities	
19 h	Payable Through Accounts	
19 i	Payment services to non-bank entities who may	
101	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 m	Trade Finance	
19 0	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 p2a 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.	
	If you offer other services to walk-in customers please provide more detail here, including	
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by	
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above	
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19 p5 19 q 20 20 a 21 3. AML, C1 22	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) 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. <b>F &amp; SANCTIONS PROGRAMME</b> Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise	
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19 p5 19 p5 19 q 20 20 a 20 a 21 22 a 22 a 22 b 22 c 22	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) 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. <b>F &amp; SANCTIONS PROGRAMME</b> Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	

22 m	Suspicious Activity Reporting	
22 n	Training and Education	
22 o	Transaction Monitoring	
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	
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.	
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	
4. ANTI E	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	
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 experience/expertise responsible for coordinating the ABC programme?	
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	
34	Is the Entity's ABC programme applicable to:	
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	
35 b	Includes enhanced requirements regarding interaction with public officials?	
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	
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?	
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	

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 a 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	<b>F &amp; SANCTIONS POLICIES &amp; PROCEDURES</b>	
5. AML, CT 46	F & SANCTIONS POLICIES & PROCEDURES Has the Entity documented policies and 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 46 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering	
46 46 a 46 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing	
46 46 a 46 b 46 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations	
46 46 a 46 b 46 c 47	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually?	
46 46 a 46 b 46 c 47 48	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against:	
46 46 a 46 b 46 c 47 48 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results?	
46 46 a 46 b 46 c 47 48 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards	
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46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 48 b 48 b 49	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 48 b 48 b 49 49 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 49 b 49 b 49 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b 49 b 49 c 49 d	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 b 49 a 49 b 49 c 49 c 49 c 49 e	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 b 49 a 49 b 49 c 49 c 49 c 49 c 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 b 49 a 49 b 49 c 49 c 49 c 49 e	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents,	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 b 49 a 49 b 49 c 49 c 49 c 49 c 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 b 49 a 49 b 49 c 49 c 49 c 49 c 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de	

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 I	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	
	similar document which defines a risk boundary 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 means any ideal in the above	
32	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. AML. CTF	& SANCTIONS RISK ASSESSMENT	
6. AML, CTF 54	& SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	
54 54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	
54 a 54 b 54 c 54 d 55 55 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	
54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	
54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	
54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c 55 c 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	
54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	
54 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	
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58 e	Name Careening	
58 f	Name Screening	
58 f 58 g	Transaction Screening Training and Education	
58 g 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 Source of funds	
64 g 64 h	Source of runds 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 67 a3	Geography	
67 a3 67 a4	Business Type/Industry Legal Entity type	
67 a4	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 68 a4	Trigger event 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 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	5 years or more	
74 a5	Trigger-based or perpetual monitoring reviews	
74 a6	Other (Please 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	Virtual Asset Service Providers	
76 y	Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	

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	
01 a	and the branch/es that this applies to	
0.0		
82	If appropriate, provide any additional information/context to the answers in this section.	
8. MONITO	DRING & REPORTING	
83	Does the Entity have risk based policies, procedures	
	and monitoring processes for the identification and	
	reporting of suspicious activity?	
04	What is the method used by the Entity to monitor	
84	transactions for suspicious activities?	
<u> </u>		
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?	
04 62	When was the outemated Transaction Manitaring	
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	
05 a	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?	
	Deep the Entity have processes in place to reason it	
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.	
9. PAYME	NT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group	
1	Payment Transparency Standards?	

93	Does the Entity have policies, procedures and	
55		
	processes to comply with and have controls in place	
	to ensure compliance with:	
93 a	FATF Recommendation 16	
93 b	Local Regulations	
93 b1	If Y, specify the regulation	
55 51		
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	
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 beneficiary address including country in cross 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	
100 u	Sanctions List (UN)	
106 b	United States Department of the Treasury's Office of	
	Foreign Assets Control (OFAC)	
106 c	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	
101	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	
107 5		
100	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	
100	Section are representative of all the LE's branches	
100		
109 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
110	lf annun viete, mussiale en verdeltienel	
110	If appropriate, provide any additional	
	information/context to the answers in this section.	
	G & 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	
	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	
	2nd Line of Defence	
112 c		
112 d	3rd Line of Defence	
112 e	Third parties to which specific FCC activities have	
	been outsourced	
112 f	Non-employed workers (contractors/consultants)	
1121		
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	

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	14 · · · · · · · · · · · · · · · · · · ·	
116	If appropriate, provide any additional information/context to the answers in this section.	
12. QUALITY	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)?	
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	
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		
13. AUDII 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?	
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	
122 b	External Third Party	
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 123 d	Governance KYC/CDD/EDD and underlying methodologies	
123 u 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 123 k	Transaction Screening including for sanctions Training & Education	
123 I	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.	
14. FRAUD		
127	Does the Entity have policies in place addressing fraud risk?	
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	

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.		
Declaratio	on Statement		
Declaration S	oup Correspondent Banking Due Diligence Questionnaire 2023 (CE statement (To be signed by Global Head of Correspondent Bank Laundering, Chief Compliance Officer, Global Head of Financial	king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of	
every effort t		ion name) is fully committed to the fight against financial crime and makes s, regulations and standards in all of the jurisdictions in which it does business and holds accounts.	
	Institution understands the critical importance of having effectival ulatory obligations.	ve and sustainable controls to combat financial crime in order to protect its reputation and to meet its	
The Financia standards.	I Institution recognises the importance of transparency regardin	g parties to transactions in international payments and has adopted/is committed to adopting these	
	I Institution further certifies it complies with / is working to compl on provided in this Wolfsberg CBDDQ will be kept current and w	y with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. vill be updated no less frequently than every eighteen months.	
The Financia	he Financial Institution commits to file accurate supplemental information on a timely basis.		
I, the answers Institution.	(Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, the e 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 stitution.		
I, Wolfsberg CB		ivalent), certify that I have read and understood this declaration, that the answers provided in this am authorised to execute this declaration on behalf of the Financial Institution.	
	(Signature & Dat	e)	
CAR	(Signature & Date)		