



Financial Institution Name: BANCO BILBAO VIZCAYA ARGENTARIA S.A.  
 Location (Country): 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
<b>1. ENTITY &amp; OWNERSHIP</b>		
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, Shanghai.
3	Full Legal (Registered) Address	Plaza de 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, Valencia, London, Mexico, New York.
6 b	Member Owned/Mutual	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	
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	BANCO DE ESPAÑA
11	Provide Legal Entity Identifier (LEI) if available	K8MS7F07N5Z2WQ51AZ71
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	Yes
14 b	Private Banking	Yes
14 c	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	Yes
14 i	Multilateral Development Bank	No
14 j	Wealth Management	Yes
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)	No
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	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
17 a	If N, clarify which questions the difference/s relate to and the branches that this applies to.	Please see annexes for all branches
18	If appropriate, provide any additional information/context to the answers in this section.	
<b>2. PRODUCTS &amp; SERVICES</b>		
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	Yes
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	Yes
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	Yes
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Yes
19 a1e	Does the Entity allow downstream relationships with foreign banks?	Yes
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Yes
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTs)?	Yes
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	No
19 a1h2	MVTs	No
19 a1h3	PSPs	No

19 a11	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/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
19 i	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 i5	Other - Please explain	
19 j	Private Banking	Both
19 k	Remote Deposit Capture (RDC)	No
19 l	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	Yes
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	Yes
19 p1a	If yes, state the applicable level of due diligence	Identification and verification
19 p2	Wire transfers	Yes
19 p2a	If yes, state the applicable level of due diligence	Identification and verification
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 a	If N, clarify which questions the difference/s relate to and the branches that this applies to.	Please see annexes for all branches
21	If appropriate, provide any additional information/context to the answers in this section.	
<b>3. AML, CTF &amp; SANCTIONS PROGRAMME</b>		
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	Yes
22 b	Adverse Information Screening	Yes
22 c	Beneficial Ownership	Yes
22 d	Cash Reporting	Yes
22 e	CDD	Yes
22 f	EDD	Yes
22 g	Independent Testing	Yes
22 h	Periodic Review	Yes
22 i	Policies and Procedures	Yes
22 j	PEP Screening	Yes
22 k	Risk Assessment	Yes
22 l	Sanctions	Yes

22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	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 Question 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?	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 branches 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 policies reviewed on an ongoing basis. Not necessarily every year, but some with a higher frequency. Approved at the level required by internal governance
<b>4. ANTI BRIBERY &amp; CORRUPTION</b>		
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:	Yes
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes



40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Yes
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.
<b>5. AML, CTF &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:	
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?	No
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 l	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.
<b>6. AML, CTF &amp; SANCTIONS RISK ASSESSMENT</b>		
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	PEP Identification	Yes
55 d	Transaction Screening	Yes
55 e	Name Screening against Adverse Media/Negative News	Yes
55 f	Training and Education	Yes
55 g	Governance	Yes
55 h	Management Information	Yes
56	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	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:	
57 a	Client	Yes
57 b	Product	Yes
57 c	Channel	Yes
57 d	Geography	Yes
58	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
58 a	Customer Due Diligence	Yes
58 b	Governance	Yes
58 c	List Management	Yes
58 d	Management Information	Yes

58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to and the branches that this applies to.	
61	If appropriate, provide any additional information/context to the answers in this section.	
<b>7. KYC, CDD and EDD</b>		
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	No
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	25%
67	Does the due diligence process result in customers receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	Length of the relationship and AML screenings
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4	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 News?	Yes
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

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69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	No
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	EDD on risk-based approach
76 b	Respondent Banks	EDD on risk-based approach
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	No EDD/restriction or prohibition
76 d	Extractive industries	No EDD/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
76 h	MSB/MVTS customers	EDD on risk-based approach
76 i	Non-account customers	No EDD/restriction or prohibition
76 j	Non-Government Organisations	No EDD/restriction or prohibition
76 k	Non-resident customers	No EDD/restriction or prohibition
76 l	Nuclear power	No EDD/restriction or prohibition
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	No EDD/restriction or prohibition
76 r	Red light businesses/Adult entertainment	No EDD/restriction or prohibition
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	Other (specify)	MVTS/MSB customers are restricted and need authorization to be clients
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/or compliance approval?	Yes

78 a	If Y indicate who provides the approval:	Both
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Yes
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	See annexes for Belgium, Germany, Hong Kong, London, Milan, Paris, Singapore and Taiwan branches.
82	If appropriate, provide any additional information/context to the answers in this section.	#65c: Key controllers are identified when they coincide with the Spanish law concept of beneficial owners (over 25%).
<b>8. MONITORING &amp; REPORTING</b>		
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Automated
84 a	If manual or combination selected, specify what type of transactions are monitored manually	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Vendor-sourced tools
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	SAS AML
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	See annexes for branches
91	If appropriate, provide any additional information/context to the answers in this section.	
<b>9. PAYMENT TRANSPARENCY</b>		
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	EU Regulation 847/2015
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	See annexes for branches
97	If appropriate, provide any additional information/context to the answers in this section.	
<b>10. SANCTIONS</b>		
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)?	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?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Automated
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	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?	Automated

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?	Yes
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 branches 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.
<b>11. TRAINING &amp; EDUCATION</b>		
111	Does the Entity provide mandatory training, which includes:	
111 a	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 f	Fraud	Yes
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	Yes
112 f	Non-employed workers (contractors/consultants)	Yes
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
<b>12. QUALITY ASSURANCE /COMPLIANCE TESTING</b>		
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
<b>13. AUDIT</b>		
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Component-based reviews
122 b	External Third Party	Yearly
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123 l	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
<b>14. FRAUD</b>		
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes



129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	

**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)

BANCO BILBAO VIZCAYA ARGENTARIA, S.A. (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.


The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

I, ESTHER GALIANA (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, EDUARDO GARDE (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.

 11/20/23 (Signature & Date)

 11/13/2023 (Signature & Date)



Financial Institution Name: \_\_\_\_\_  
 Location (Country) : \_\_\_\_\_

No #	Question	Answer
<b>1. ENTITY &amp; OWNERSHIP</b>		
1	Full Legal 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	
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	
6 c	Government or State Owned by 25% or more	
6 d	Privately Owned	
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
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)	

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	
14 e	Investment Banking	
14 f	Financial Markets Trading	
14 g	Securities Services/Custody	
14 h	Broker/Dealer	
14 i	Multilateral Development Bank	
14 j	Wealth Management	
14 k	Other (please explain)	
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)	
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	
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.	
<b>2. PRODUCTS &amp; SERVICES</b>		
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	
19 a1e	Does the Entity allow downstream relationships with foreign banks?	
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTs)?	
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	
19 a1h2	MVTs	
19 a1h3	PSPs	

19 a i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	
19 c	Cross-Border Remittances	
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 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 l	Sponsoring Private ATMs	
19 m	Stored Value Instruments	
19 n	Trade Finance	
19 o	Virtual Assets	
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	
19 p4a	If yes, state the applicable level of due diligence	
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	
<b>3. AML, CTF &amp; SANCTIONS PROGRAMME</b>		
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	Adverse Information Screening	
22 c	Beneficial Ownership	
22 d	Cash Reporting	
22 e	CDD	
22 f	EDD	
22 g	Independent Testing	
22 h	Periodic Review	
22 i	Policies and Procedures	
22 j	PEP Screening	
22 k	Risk Assessment	
22 l	Sanctions	

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.	
<b>4. ANTI BRIBERY &amp; CORRUPTION</b>		
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 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.	
<b>5. AML, CTF &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:	
46 a	Money laundering	
46 b	Terrorist financing	
46 c	Sanctions violations	
47	Are the Entity's policies and procedures updated at least annually?	
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	
48 b1	If Y, does the Entity retain a record of the results?	
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	
49 d	Prohibit accounts/relationships with shell banks	
49 e	Prohibit dealing with another entity that provides services to shell banks	
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	
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	
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	

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

58 e	Name Screening	
58 f	Transaction Screening	
58 g	Training and Education	
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	
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.	
<b>7. KYC, CDD and EDD</b>		
62	Does the Entity verify the identity of the customer?	
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	
64 b	Expected activity	
64 c	Nature of business/employment	
64 d	Ownership structure	
64 e	Product usage	
64 f	Purpose and nature of relationship	
64 g	Source of funds	
64 h	Source of wealth	
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	
65 a1	Are ultimate beneficial owners verified?	
65 b	Authorised signatories (where applicable)	
65 c	Key controllers	
65 d	Other relevant parties	
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	
67	Does the due diligence process result in customers receiving a risk classification?	
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	
67 a2	Geography	
67 a3	Business Type/Industry	
67 a4	Legal Entity type	
67 a5	Adverse Information	
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	
68 a	If Y, is this at:	
68 a1	Onboarding	
68 a2	KYC renewal	
68 a3	Trigger event	
68 a4	Other	
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	
69 a	If Y, is this at:	
69 a1	Onboarding	
69 a2	KYC renewal	



69 a3	Trigger event	
70	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 l	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 and the branch/es that this applies to	
82	If appropriate, provide any additional information/context to the answers in this section.	
<b>8. MONITORING &amp; REPORTING</b>		
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	
84	What is the method used by the Entity to monitor transactions for suspicious activities?	
84 a	If manual or combination selected, specify what type of transactions are monitored manually	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	
84 b2	When was the tool last updated?	
84 b3	When was the automated Transaction Monitoring application last calibrated?	
85	Does the Entity have regulatory requirements to report suspicious transactions?	
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	
<b>9. PAYMENT TRANSPARENCY</b>		
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	
93 b	Local Regulations	
93 b1	If Y, specify the regulation	
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.	
<b>10. SANCTIONS</b>		
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	
102	What is the method used by the Entity for sanctions screening?	
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	
104	What is the method used by the Entity?	

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	
106 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 Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	
107 b	Transactions	
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	
109 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.	
<b>11. TRAINING &amp; EDUCATION</b>		
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	
111 e	Conduct and Culture	
111 f	Fraud	
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	
112 b	1st Line of Defence	
112 c	2nd Line of Defence	
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)	
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.	
116	If appropriate, provide any additional information/context to the answers in this section.	
<b>12. QUALITY ASSURANCE /COMPLIANCE TESTING</b>		
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.	
<b>13. AUDIT</b>		
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	Governance	
123 d	KYC/CDD/EDD and underlying methodologies	
123 e	Name Screening & List Management	
123 f	Reporting/Metrics & Management Information	
123 g	Suspicious Activity Filing	
123 h	Technology	
123 i	Transaction Monitoring	
123 j	Transaction Screening including for sanctions	
123 k	Training & Education	
123 l	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	
125	Confirm that all responses provided in the above section are representative of all the LE's branches	
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
<b>14. FRAUD</b>		
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.	

### **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)

\_\_\_\_\_ (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

I, \_\_\_\_\_ (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

I, \_\_\_\_\_ (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)





Financial Institution Name:  
Location (Country) :

BBVA Bank  
Taiwan

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
<b>1. ENTITY &amp; OWNERSHIP</b>		
1	Full Legal Name	BBVA Bank
2	Append a list of foreign branches which are covered by this questionnaire	Taipei branch
3	Full Legal (Registered) Address	Unit D, Level 45, Taipei 101 Tower, No.7 Xinyi Rd, Sec 5, Taipei City 11049, Taiwan, ROC
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	11/23/2011
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	Financial Supervisory Committee (FSC)
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 <input type="checkbox"/>
14 b	Private Banking	No <input type="checkbox"/>
14 c	Commercial Banking	No <input type="checkbox"/>
14 d	Transactional Banking	Yes <input type="checkbox"/>
14 e	Investment Banking	No <input type="checkbox"/>
14 f	Financial Markets Trading	No <input type="checkbox"/>
14 g	Securities Services/Custody	No <input type="checkbox"/>
14 h	Broker/Dealer	No <input type="checkbox"/>
14 i	Multilateral Development Bank	No <input type="checkbox"/>
14 j	Wealth Management	No <input type="checkbox"/>
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)	No <input type="checkbox"/>
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 <input type="checkbox"/>
16 b	Total Assets	Between \$10 and \$100 million <input type="checkbox"/>
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.	
<b>2. PRODUCTS &amp; SERVICES</b>		
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	No <input type="checkbox"/>
19 a1	If Y	
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?	No <input type="checkbox"/>
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTs)?	No <input type="checkbox"/>
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	No <input type="checkbox"/>
19 a1h2	MVTs	No <input type="checkbox"/>
19 a1h3	PSPs	No <input type="checkbox"/>



19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/PSPs?	No	<input type="button" value="Select"/>
19 b	Cross-Border Bulk Cash Delivery	No	<input type="button" value="Select"/>
19 c	Cross-Border Remittances	Yes	<input type="button" value="Select"/>
19 d	Domestic Bulk Cash Delivery	No	<input type="button" value="Select"/>
19 e	Hold Mail	No	<input type="button" value="Select"/>
19 f	International Cash Letter	No	<input type="button" value="Select"/>
19 g	Low Price Securities	No	<input type="button" value="Select"/>
19 h	Payable Through Accounts	No	<input type="button" value="Select"/>
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	No	<input type="button" value="Select"/>
19 i1	If Y , please select all that apply below?		
19 i2	Third Party Payment Service Providers	No	<input type="button" value="Select"/>
19 i3	Virtual Asset Service Providers (VASPs)	No	<input type="button" value="Select"/>
19 i4	eCommerce Platforms	No	<input type="button" value="Select"/>
19 i5	Other - Please explain		
19 j	Private Banking	No	<input type="button" value="Select"/>
19 k	Remote Deposit Capture (RDC)	No	<input type="button" value="Select"/>
19 l	Sponsoring Private ATMs	No	<input type="button" value="Select"/>
19 m	Stored Value Instruments	No	<input type="button" value="Select"/>
19 n	Trade Finance	Yes	<input type="button" value="Select"/>
19 o	Virtual Assets	No	<input type="button" value="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	<input type="button" value="Select"/>
19 p1a	If yes, state the applicable level of due diligence	Please select	
19 p2	Wire transfers	Yes	<input type="button" value="Select"/>
19 p2a	If yes, state the applicable level of due diligence	Identification and verification	<input type="button" value="Select"/>
19 p3	Foreign currency conversion	No	<input type="button" value="Select"/>
19 p3a	If yes, state the applicable level of due diligence	Please select	
19 p4	Sale of Monetary Instruments	No	<input type="button" value="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 branches that this applies to.		
21	If appropriate, provide any additional 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/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
22 i	Policies and Procedures	Please select
22 j	PEP Screening	Please select
22 k	Risk Assessment	Please select
22 l	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?	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.	Telpei branch does not deal with Cash
<b>4. ANTI BRIBERY &amp; CORRUPTION</b>		
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 Entity's ABC programme applicable to:	Not Applicable 
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	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?	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	<input type="button" value="v"/>
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	<input type="button" value="v"/>
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:		
42 a	Board and senior Committee Management	No	<input type="button" value="v"/>
42 b	1st Line of Defence	Please select	
42 c	2nd Line of Defence	Please select	
42 d	3rd Line of Defence	No	<input type="button" value="v"/>
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	No	<input type="button" value="v"/>
42 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable	<input type="button" value="v"/>
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.		
<b>5. AML, CTF &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:		
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
49 l	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.	
<b>6. AML, CTF &amp; SANCTIONS RISK ASSESSMENT</b>		
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	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	Governance	Please select
58 c	List Management	Please select
58 d	Management Information	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.	
<b>7. KYC, CDD and EDD</b>		
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	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 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	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

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:	
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	Prohibited 
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	EDD on risk-based approach 
76 d	Extractive industries	Please select
76 e	Gambling customers	Prohibited 
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	Prohibited 
76 j	Non-Government Organisations	Prohibited 
76 k	Non-resident customers	Prohibited 
76 l	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 p	PEP Related	Please select
76 q	Precious metals and stones	Please select
76 r	Red light businesses/Adult entertainment	Please select
76 s	Regulated charities	Please select
76 t	Shell banks	Prohibited 
76 u	Travel and Tour Companies	Please select
76 v	Unregulated charities	Please select
76 w	Used Car Dealers	Please select
76 x	Virtual Asset Service Providers	Please select
76 y	Other (specify)	
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.	
<b>8. MONITORING &amp; REPORTING</b>		
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?	Combination of automated 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 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	
91	If appropriate, provide any additional information/context to the answers in this section.	
<b>9. PAYMENT TRANSPARENCY</b>		
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	
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.	
<b>10. SANCTIONS</b>		
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?	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 branches that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	
<b>11. TRAINING &amp; EDUCATION</b>		
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?	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 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.	
<b>12. QUALITY ASSURANCE/COMPLIANCE TESTING</b>		
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.	
<b>13. AUDIT</b>		
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	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
123 l	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.	
<b>14. FRAUD</b>		
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.	

**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 fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

I, James 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.I, David Pan (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.James Kao (Signature & Date)David Pan (Signature & Date)

2023.12.14



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 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
<b>1. ENTITY &amp; OWNERSHIP</b>		
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)	
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)	Please select
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	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.	
<b>2. PRODUCTS &amp; SERVICES</b>		
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	No
19 a1	If Y	
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 (MVTs)?	Please select
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	Please select
19 a1h2	MVTs	Please select
19 a1h3	PSPs	Please select

19 a11	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/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
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 i5	Other - Please explain	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	Please select
19 l	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 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.	
<b>3. AML, CTF &amp; SANCTIONS PROGRAMME</b>		
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
22 i	Policies and Procedures	Please select
22 j	PEP Screening	Please select
22 k	Risk Assessment	Please select
22 l	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.	
<b>4. ANTI BRIBERY &amp; CORRUPTION</b>		
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 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:	
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.	
<b>5. AML, CTF &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:	
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
49 l	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.	
<b>6. AML, CTF &amp; SANCTIONS RISK ASSESSMENT</b>		
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	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	Governance	Please select
58 c	List Management	Please select
58 d	Management Information	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.	
<b>7. KYC, CDD and EDD</b>		
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	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 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	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

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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:	
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	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
76 l	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	Precious metals and stones	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	Virtual Asset Service Providers	Please select
76 y	Other (specify)	
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	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
<b>8. MONITORING &amp; REPORTING</b>		
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 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	
91	If appropriate, provide any additional information/context to the answers in this section.	
<b>9. PAYMENT TRANSPARENCY</b>		
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	
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.	
<b>10. SANCTIONS</b>		
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?	No
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.	
<b>11. TRAINING &amp; EDUCATION</b>		
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?	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 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.	In addition to BBVA Group trainings, Banco Bilbao Vizcaya Argentaria S.A., Niederlassung Deutschland provides regular onsite training to its staff in Germany.
<b>12. QUALITY ASSURANCE /COMPLIANCE TESTING</b>		
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.	
<b>13. AUDIT</b>		
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	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
123 l	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.	
<b>14. FRAUD</b>		
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.	

**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 S.A., Niederlassung Deutschland (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

I, N/A (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, Marek Kilian, Head of Compliance & AML Germany (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)

BBVA  
 Banco Bilbao Vizcaya Argentaria, S.A.  
 Niederlassung Deutschland  
 Neue Mainzer Str. 28  
 60311 Frankfurt





Financial Institution Name: \_\_\_\_\_  
 Location (Country) : \_\_\_\_\_

No #	Question	Answer
<b>1. ENTITY &amp; OWNERSHIP</b>		
1	Full Legal 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	
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	
6 c	Government or State Owned by 25% or more	
6 d	Privately Owned	
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
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)	

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	
14 e	Investment Banking	
14 f	Financial Markets Trading	
14 g	Securities Services/Custody	
14 h	Broker/Dealer	
14 i	Multilateral Development Bank	
14 j	Wealth Management	
14 k	Other (please explain)	
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)	
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	
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.	
<b>2. PRODUCTS &amp; SERVICES</b>		
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	
19 a1e	Does the Entity allow downstream relationships with foreign banks?	
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTs)?	
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	
19 a1h2	MVTs	
19 a1h3	PSPs	

19 a i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	
19 c	Cross-Border Remittances	
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 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 l	Sponsoring Private ATMs	
19 m	Stored Value Instruments	
19 n	Trade Finance	
19 o	Virtual Assets	
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	
19 p4a	If yes, state the applicable level of due diligence	
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	
<b>3. AML, CTF &amp; SANCTIONS PROGRAMME</b>		
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	Adverse Information Screening	
22 c	Beneficial Ownership	
22 d	Cash Reporting	
22 e	CDD	
22 f	EDD	
22 g	Independent Testing	
22 h	Periodic Review	
22 i	Policies and Procedures	
22 j	PEP Screening	
22 k	Risk Assessment	
22 l	Sanctions	

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.	
<b>4. ANTI BRIBERY &amp; CORRUPTION</b>		
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 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.	
<b>5. AML, CTF &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:	
46 a	Money laundering	
46 b	Terrorist financing	
46 c	Sanctions violations	
47	Are the Entity's policies and procedures updated at least annually?	
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	
48 b1	If Y, does the Entity retain a record of the results?	
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	
49 d	Prohibit accounts/relationships with shell banks	
49 e	Prohibit dealing with another entity that provides services to shell banks	
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	
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	
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	

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

58 e	Name Screening	
58 f	Transaction Screening	
58 g	Training and Education	
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	
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.	
<b>7. KYC, CDD and EDD</b>		
62	Does the Entity verify the identity of the customer?	
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	
64 b	Expected activity	
64 c	Nature of business/employment	
64 d	Ownership structure	
64 e	Product usage	
64 f	Purpose and nature of relationship	
64 g	Source of funds	
64 h	Source of wealth	
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	
65 a1	Are ultimate beneficial owners verified?	
65 b	Authorised signatories (where applicable)	
65 c	Key controllers	
65 d	Other relevant parties	
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	
67	Does the due diligence process result in customers receiving a risk classification?	
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	
67 a2	Geography	
67 a3	Business Type/Industry	
67 a4	Legal Entity type	
67 a5	Adverse Information	
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	
68 a	If Y, is this at:	
68 a1	Onboarding	
68 a2	KYC renewal	
68 a3	Trigger event	
68 a4	Other	
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	
69 a	If Y, is this at:	
69 a1	Onboarding	
69 a2	KYC renewal	

69 a3	Trigger event	
70	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 l	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 and the branch/es that this applies to	
82	If appropriate, provide any additional information/context to the answers in this section.	
<b>8. MONITORING &amp; REPORTING</b>		
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	
84	What is the method used by the Entity to monitor transactions for suspicious activities?	
84 a	If manual or combination selected, specify what type of transactions are monitored manually	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	
84 b2	When was the tool last updated?	
84 b3	When was the automated Transaction Monitoring application last calibrated?	
85	Does the Entity have regulatory requirements to report suspicious transactions?	
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	
<b>9. PAYMENT TRANSPARENCY</b>		
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	
93 b	Local Regulations	
93 b1	If Y, specify the regulation	
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.	
<b>10. SANCTIONS</b>		
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	
102	What is the method used by the Entity for sanctions screening?	
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	
104	What is the method used by the Entity?	

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	
106 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 Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	
107 b	Transactions	
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	
109 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.	
<b>11. TRAINING &amp; EDUCATION</b>		
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	
111 e	Conduct and Culture	
111 f	Fraud	
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	
112 b	1st Line of Defence	
112 c	2nd Line of Defence	
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)	
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.	
116	If appropriate, provide any additional information/context to the answers in this section.	
<b>12. QUALITY ASSURANCE /COMPLIANCE TESTING</b>		
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.	
<b>13. AUDIT</b>		
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	Governance	
123 d	KYC/CDD/EDD and underlying methodologies	
123 e	Name Screening & List Management	
123 f	Reporting/Metrics & Management Information	
123 g	Suspicious Activity Filing	
123 h	Technology	
123 i	Transaction Monitoring	
123 j	Transaction Screening including for sanctions	
123 k	Training & Education	
123 l	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	
125	Confirm that all responses provided in the above section are representative of all the LE's branches	
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
<b>14. FRAUD</b>		
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.	

### **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)

\_\_\_\_\_ (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

I, \_\_\_\_\_ (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

I, \_\_\_\_\_ (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)



Assinado por: Jorge Manuel  
Canha Carvalho Luis  
Identificação: 8107440544  
Data: 2023-11-27 às 15:46:44  
Local: LISBON  
Motivo: WOLFSBERG QUESTIONNAIRE  
BBVA PORTUGAL



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 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
<b>1. ENTITY &amp; OWNERSHIP</b>		
1	Full Legal Name	Banco Bilbao Vizcaya Argentaria, S.A. Shanghai Branch
2	Append a list of foreign branches which are covered by this questionnaire	BBVA Shanghai Branch
3	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 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	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)	

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	No
14 f	Financial Markets Trading	Please select
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	Please select
14 i	Multilateral Development Bank	Please select
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)	Please select
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	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.	
<b>2. PRODUCTS &amp; SERVICES</b>		
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	Please select
19 a1	If Y	
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	Please select
19 a1h3	PSPs	Please select

19 a1	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/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 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 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 i5	Other - Please explain	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	Please select
19 l	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 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.	No.
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.	
<b>3. AML, CTF &amp; SANCTIONS PROGRAMME</b>		
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
22 i	Policies and Procedures	Please select
22 j	PEP Screening	Please select
22 k	Risk Assessment	Please select
22 l	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.	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?	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 branches that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	
<b>4. ANTI BRIBERY &amp; CORRUPTION</b>		
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 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:	
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 branches that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
<b>5. AML, CTF &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:	
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
49 l	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 branches that this applies to.	
53	If appropriate, provide any additional information/context to the answers in this section.	
<b>6. AML, CTF &amp; SANCTIONS RISK ASSESSMENT</b>		
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	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	Governance	Please select
58 c	List Management	Please select
58 d	Management Information	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.	
<b>7. KYC, CDD and EDD</b>		
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	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 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	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

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:	
74 a1	Less than one year	Yes
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	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
76 l	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	Precious metals and stones	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	Virtual Asset Service Providers	Please select
76 y	Other (specify)	
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.	
<b>8. MONITORING &amp; REPORTING</b>		
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 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	
91	If appropriate, provide any additional information/context to the answers in this section.	
<b>9. PAYMENT TRANSPARENCY</b>		
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	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.	
<b>10. SANCTIONS</b>		
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?	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.	
<b>11. TRAINING &amp; EDUCATION</b>		
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?	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 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.	
<b>12. QUALITY ASSURANCE / COMPLIANCE TESTING</b>		
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.	
<b>13. AUDIT</b>		
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	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
123 l	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.	
<b>14. FRAUD</b>		
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.	

**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)

BANCO BILBAO VIZCAYA ARGENTARIA S.A Shanghai (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

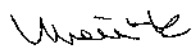
The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

I, \_\_\_\_\_ (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

I, Wenjie He (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)

 24 Nov 2023  
(Signature & Date)



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



Financial Institution Name:  
Location (Country) :

BBVA SA, NEW YORK BRANCH  
USA

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
<b>1. ENTITY &amp; OWNERSHIP</b>		
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
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	
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

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

<b>12</b>	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	None
<b>13</b>	Jurisdiction of licensing authority and regulator of ultimate parent	SPAIN
<b>14</b>	Select the business areas applicable to the Entity	
<b>14 a</b>	Retail Banking	No
<b>14 b</b>	Private Banking	No
<b>14 c</b>	Commercial Banking	Yes
<b>14 d</b>	Transactional Banking	Yes
<b>14 e</b>	Investment Banking	Yes
<b>14 f</b>	Financial Markets Trading	Yes
<b>14 g</b>	Securities Services/Custody	No
<b>14 h</b>	Broker/Dealer	No
<b>14 i</b>	Multilateral Development Bank	No
<b>14 j</b>	Wealth Management	No
<b>14 k</b>	Other (please explain)	
<b>15</b>	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
<b>15 a</b>	If Y, provide the top five countries where the non-resident customers are located.	1. Peru 2. Colombia 3. Argentina 4. Bermuda 5. Mexico
<b>16</b>	Select the closest value:	
<b>16 a</b>	Number of employees	51-200
<b>16 b</b>	Total Assets	Greater than \$500 million
<b>17</b>	Confirm that all responses provided in the above Section are representative of all the LE's branches.	No
<b>17 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	<a href="#">See BBVA Due Diligence for global branches of BBVA S.A.</a>
<b>18</b>	If appropriate, provide any additional information/context to the answers in this section.	

**2. PRODUCTS & SERVICES**

<b>19</b>	Does the Entity offer the following products and services:	
<b>19 a</b>	Correspondent Banking	Yes
<b>19 a1</b>	If Y	
<b>19 a1a</b>	Does the Entity offer Correspondent Banking services to domestic banks?	No
<b>19 a1b</b>	Does the Entity allow domestic bank clients to provide downstream relationships?	No
<b>19 a1c</b>	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes
<b>19 a1d</b>	Does the Entity offer Correspondent Banking services to foreign banks?	Yes
<b>19 a1e</b>	Does the Entity allow downstream relationships with foreign banks?	No
<b>19 a1f</b>	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Yes
<b>19 a1g</b>	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTs)?	No
<b>19 a1h</b>	Does the Entity allow downstream relationships with MSBs, MVTs, or Payment Service Provider (PSPs)?	
<b>19 a1h1</b>	MSBs	No
<b>19 a1h2</b>	MVTs	No
<b>19 a1h3</b>	PSPs	No
<b>19 a1i</b>	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/PSPs?	Yes
<b>19 b</b>	Cross-Border Bulk Cash Delivery	No
<b>19 c</b>	Cross-Border Remittances	Yes

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

<b>19 d</b>	Domestic Bulk Cash Delivery	No
<b>19 e</b>	Hold Mail	No
<b>19 f</b>	International Cash Letter	No
<b>19 g</b>	Low Price Securities	No
<b>19 h</b>	Payable Through Accounts	No
<b>19 i</b>	Payment services to non-bank entities who may then offer third party payment services to their customers?	No
<b>19 i1</b>	If Y , please select all that apply below?	
<b>19 i2</b>	Third Party Payment Service Providers	
<b>19 i3</b>	Virtual Asset Service Providers (VASPs)	
<b>19 i4</b>	eCommerce Platforms	
<b>19 i5</b>	Other - Please explain	
<b>19 j</b>	Private Banking	No
<b>19 k</b>	Remote Deposit Capture (RDC)	No
<b>19 l</b>	Sponsoring Private ATMs	No
<b>19 m</b>	Stored Value Instruments	No
<b>19 n</b>	Trade Finance	Yes
<b>19 o</b>	Virtual Assets	No
<b>19 p</b>	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:	
<b>19 p1</b>	Check cashing service	No
<b>19 p1a</b>	If yes, state the applicable level of due diligence	
<b>19 p2</b>	Wire transfers	No
<b>19 p2a</b>	If yes, state the applicable level of due diligence	
<b>19 p3</b>	Foreign currency conversion	No
<b>19 p3a</b>	If yes, state the applicable level of due diligence	
<b>19 p4</b>	Sale of Monetary Instruments	No
<b>19 p4a</b>	If yes, state the applicable level of due diligence	
<b>19 p5</b>	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	
<b>19 q</b>	Other high-risk products and services identified by the Entity (please specify)	FX Trading Third Party Demand Deposit Accounts (Checking, Savings)
<b>20</b>	Confirm that all responses provided in the above Section are representative of all the LE's branches.	No
<b>20 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	<a href="#">See BBVA Due Diligence for global branches of BBVA S.A.</a>
<b>21</b>	If appropriate, provide any additional information/context to the answers in this section.	
<b>3. AML, CTF &amp; SANCTIONS PROGRAMME</b>		
<b>22</b>	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
<b>22 a</b>	Appointed Officer with sufficient experience/expertise	Yes
<b>22 b</b>	Adverse Information Screening	Yes
<b>22 c</b>	Beneficial Ownership	Yes
<b>22 d</b>	Cash Reporting	Yes
<b>22 e</b>	CDD	Yes
<b>22 f</b>	EDD	Yes
<b>22 g</b>	Independent Testing	Yes
<b>22 h</b>	Periodic Review	Yes
<b>22 i</b>	Policies and Procedures	Yes
<b>22 j</b>	PEP Screening	Yes
<b>22 k</b>	Risk Assessment	Yes
<b>22 l</b>	Sanctions	Yes
<b>22 m</b>	Suspicious Activity Reporting	Yes
<b>22 n</b>	Training and Education	Yes
<b>22 o</b>	Transaction Monitoring	Yes
<b>23</b>	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	11-100
<b>24</b>	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Yes

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

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.	<a href="#">See BBVA Due Diligence for global branches of BBVA S.A.</a>
29	If appropriate, provide any additional information/context to the answers in this section.	
<b>4. ANTI BRIBERY &amp; CORRUPTION</b>		
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 third-party providers as appropriate	Yes
40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes

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

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	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.
<b>5. AML, CTF &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:	
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 l	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



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

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	No
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	<a href="#">See BBVA Due Diligence for global branches of BBVA S.A.</a>
53	If appropriate, provide any additional information/context to the answers in this section.	
<b>6. AML, CTF &amp; SANCTIONS RISK ASSESSMENT</b>		
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	PEP Identification	Yes
55 d	Transaction Screening	Yes
55 e	Name Screening against Adverse Media/Negative News	Yes
55 f	Training and Education	Yes
55 g	Governance	Yes
55 h	Management Information	Yes
56	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	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:	
57 a	Client	Yes
57 b	Product	Yes
57 c	Channel	Yes
57 d	Geography	Yes
58	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
58 a	Customer Due Diligence	Yes
58 b	Governance	Yes
58 c	List Management	Yes
58 d	Management Information	Yes
58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	<a href="#">See BBVA Due Diligence for global branches of BBVA S.A.</a>
61	If appropriate, provide any additional information/context to the answers in this section.	
<b>7. KYC, CDD and EDD</b>		
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	

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

64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	10%
67	Does the due diligence process result in customers receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	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 part of your KYC process?	Yes
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 customers for Adverse Media/Negative News?	Yes
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 Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	No
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	No
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	

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

<b>76 a</b>	Arms, defence, military	EDD on risk-based approach
<b>76 b</b>	Respondent Banks	EDD on risk-based approach
<b>76 b1</b>	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
<b>76 c</b>	Embassies/Consulates	EDD on risk-based approach
<b>76 d</b>	Extractive industries	EDD on risk-based approach
<b>76 e</b>	Gambling customers	EDD on risk-based approach
<b>76 f</b>	General Trading Companies	EDD on risk-based approach
<b>76 g</b>	Marijuana-related Entities	Prohibited
<b>76 h</b>	MSB/MVTS customers	EDD on risk-based approach
<b>76 i</b>	Non-account customers	Prohibited
<b>76 j</b>	Non-Government Organisations	EDD on risk-based approach
<b>76 k</b>	Non-resident customers	EDD on risk-based approach
<b>76 l</b>	Nuclear power	EDD on risk-based approach
<b>76 m</b>	Payment Service Providers	EDD on risk-based approach
<b>76 n</b>	PEPs	EDD on risk-based approach
<b>76 o</b>	PEP Close Associates	EDD on risk-based approach
<b>76 p</b>	PEP Related	EDD on risk-based approach
<b>76 q</b>	Precious metals and stones	EDD on risk-based approach
<b>76 r</b>	Red light businesses/Adult entertainment	Do not have this category of customer or industry
<b>76 s</b>	Regulated charities	EDD on risk-based approach
<b>76 t</b>	Shell banks	Prohibited
<b>76 u</b>	Travel and Tour Companies	EDD on risk-based approach
<b>76 v</b>	Unregulated charities	Do not have this category of customer or industry
<b>76 w</b>	Used Car Dealers	Do not have this category of customer or industry
<b>76 x</b>	Virtual Asset Service Providers	Do not have this category of customer or industry
<b>76 y</b>	Other (specify)	EDD on risk-based approach
<b>77</b>	If restricted, provide details of the restriction	
<b>78</b>	Does EDD require senior business management and/or compliance approval?	Yes
<b>78 a</b>	If Y indicate who provides the approval:	Compliance
<b>79</b>	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	No
<b>80</b>	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
<b>81</b>	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
<b>81 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	<a href="#">See BBVA Due Diligence for global branches of BBVA S.A.</a>
<b>82</b>	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 maintenance processes.
<b>8. MONITORING &amp; REPORTING</b>		
<b>83</b>	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
<b>84</b>	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
<b>84 a</b>	If manual or combination selected, specify what type of transactions are monitored manually	All activity have automated monitoring. Official checks and trade finance activities have additional manual monitoring.
<b>84 b</b>	If automated or combination selected, are internal system or vendor-sourced tools used?	Both
<b>84 b1</b>	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	Mantas Oracle
<b>84 b2</b>	When was the tool last updated?	
<b>84 b3</b>	When was the automated Transaction Monitoring application last calibrated?	< 1 year
<b>85</b>	Does the Entity have regulatory requirements to report suspicious transactions?	Yes

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

<b>85 a</b>	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
<b>86</b>	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
<b>87</b>	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
<b>88</b>	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
<b>89</b>	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
<b>90</b>	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
<b>90 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	<a href="#">See BBVA Due Diligence for global branches of BBVA S.A.</a>
<b>91</b>	If appropriate, provide any additional information/context to the answers in this section.	
<b>9. PAYMENT TRANSPARENCY</b>		
<b>92</b>	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
<b>93</b>	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
<b>93 a</b>	FATF Recommendation 16	Yes
<b>93 b</b>	Local Regulations	Yes
<b>93 b1</b>	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
<b>93 c</b>	If N, explain	
<b>94</b>	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
<b>95</b>	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
<b>95 a</b>	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
<b>96</b>	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
<b>96 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	<a href="#">See BBVA Due Diligence for global branches of BBVA S.A.</a>
<b>97</b>	If appropriate, provide any additional information/context to the answers in this section.	
<b>10. SANCTIONS</b>		
<b>98</b>	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
<b>99</b>	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

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

<b>100</b>	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
<b>101</b>	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
<b>102</b>	What is the method used by the Entity for sanctions screening?	Both Automated and Manual
<b>102 a</b>	If 'automated' or 'both automated and manual' selected:	
<b>102 a1</b>	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
<b>102 a1a</b>	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Accuity Inc. and Lexis Nexis Risk Solutions
<b>102 a2</b>	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
<b>103</b>	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
<b>104</b>	What is the method used by the Entity?	Combination of automated and manual
<b>105</b>	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
<b>106</b>	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
<b>106 a</b>	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
<b>106 b</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
<b>106 c</b>	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
<b>106 d</b>	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
<b>106 e</b>	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
<b>106 f</b>	Other (specify)	
<b>107</b>	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:	
<b>107 a</b>	Customer Data	Same day to 2 business days
<b>107 b</b>	Transactions	Same day to 2 business days
<b>108</b>	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
<b>109</b>	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
<b>109 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	<a href="#">See BBVA Due Diligence for global branches of BBVA S.A.</a>
<b>110</b>	If appropriate, provide any additional information/context to the answers in this section.	
<b>11. TRAINING &amp; EDUCATION</b>		
<b>111</b>	Does the Entity provide mandatory training, which includes:	
<b>111 a</b>	Identification and reporting of transactions to government authorities	Yes
<b>111 b</b>	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
<b>111 c</b>	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
<b>111 d</b>	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes

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

111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to :	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	No
112 f	Non-employed workers (contractors/consultants)	Yes
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Other
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	<a href="#">See BBVA Due Diligence for global branches of BBVA S.A.</a>
116	If appropriate, provide any additional information/context to the answers in this section.	
<b>12. QUALITY ASSURANCE /COMPLIANCE TESTING</b>		
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	<a href="#">See BBVA Due Diligence for global branches of BBVA S.A.</a>
120	If appropriate, provide any additional information/context to the answers in this section.	
<b>13. AUDIT</b>		
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	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 procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123 l	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes

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

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.	<a href="#">See BBVA Due Diligence for global branches of BBVA S.A.</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.	<a href="#">See BBVA Due Diligence for global branches of BBVA S.A.</a>
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 NEW YORK

(Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

I, \_\_\_\_\_ (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

I, Kristine Canguesta (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.

Date: March 7th, 2024



Financial Institution Name: \_\_\_\_\_  
 Location (Country) : \_\_\_\_\_

No #	Question	Answer
<b>1. ENTITY &amp; OWNERSHIP</b>		
1	Full Legal 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	
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	
6 c	Government or State Owned by 25% or more	
6 d	Privately Owned	
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
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)	



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	
14 e	Investment Banking	
14 f	Financial Markets Trading	
14 g	Securities Services/Custody	
14 h	Broker/Dealer	
14 i	Multilateral Development Bank	
14 j	Wealth Management	
14 k	Other (please explain)	
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)	
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	
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.	
<b>2. PRODUCTS &amp; SERVICES</b>		
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	
19 a1e	Does the Entity allow downstream relationships with foreign banks?	
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTs)?	
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	
19 a1h2	MVTs	
19 a1h3	PSPs	

19 a i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	
19 c	Cross-Border Remittances	
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 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 l	Sponsoring Private ATMs	
19 m	Stored Value Instruments	
19 n	Trade Finance	
19 o	Virtual Assets	
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	
19 p4a	If yes, state the applicable level of due diligence	
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	
<b>3. AML, CTF &amp; SANCTIONS PROGRAMME</b>		
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	Adverse Information Screening	
22 c	Beneficial Ownership	
22 d	Cash Reporting	
22 e	CDD	
22 f	EDD	
22 g	Independent Testing	
22 h	Periodic Review	
22 i	Policies and Procedures	
22 j	PEP Screening	
22 k	Risk Assessment	
22 l	Sanctions	

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.	
<b>4. ANTI BRIBERY &amp; CORRUPTION</b>		
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 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.	
<b>5. AML, CTF &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:	
46 a	Money laundering	
46 b	Terrorist financing	
46 c	Sanctions violations	
47	Are the Entity's policies and procedures updated at least annually?	
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	
48 b1	If Y, does the Entity retain a record of the results?	
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	
49 d	Prohibit accounts/relationships with shell banks	
49 e	Prohibit dealing with another entity that provides services to shell banks	
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	
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	
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	

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

58 e	Name Screening	
58 f	Transaction Screening	
58 g	Training and Education	
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	
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.	
<b>7. KYC, CDD and EDD</b>		
62	Does the Entity verify the identity of the customer?	
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	
64 b	Expected activity	
64 c	Nature of business/employment	
64 d	Ownership structure	
64 e	Product usage	
64 f	Purpose and nature of relationship	
64 g	Source of funds	
64 h	Source of wealth	
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	
65 a1	Are ultimate beneficial owners verified?	
65 b	Authorised signatories (where applicable)	
65 c	Key controllers	
65 d	Other relevant parties	
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	
67	Does the due diligence process result in customers receiving a risk classification?	
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	
67 a2	Geography	
67 a3	Business Type/Industry	
67 a4	Legal Entity type	
67 a5	Adverse Information	
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	
68 a	If Y, is this at:	
68 a1	Onboarding	
68 a2	KYC renewal	
68 a3	Trigger event	
68 a4	Other	
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	
69 a	If Y, is this at:	
69 a1	Onboarding	
69 a2	KYC renewal	

69 a3	Trigger event	
70	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 l	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 and the branch/es that this applies to	
82	If appropriate, provide any additional information/context to the answers in this section.	
<b>8. MONITORING &amp; REPORTING</b>		
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	
84	What is the method used by the Entity to monitor transactions for suspicious activities?	
84 a	If manual or combination selected, specify what type of transactions are monitored manually	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	
84 b2	When was the tool last updated?	
84 b3	When was the automated Transaction Monitoring application last calibrated?	
85	Does the Entity have regulatory requirements to report suspicious transactions?	
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	
<b>9. PAYMENT TRANSPARENCY</b>		
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	



93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	
93 b	Local Regulations	
93 b1	If Y, specify the regulation	
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.	
<b>10. SANCTIONS</b>		
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	
102	What is the method used by the Entity for sanctions screening?	
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	
104	What is the method used by the Entity?	

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	
106 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 Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	
107 b	Transactions	
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	
109 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.	
<b>11. TRAINING &amp; EDUCATION</b>		
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	
111 e	Conduct and Culture	
111 f	Fraud	
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	
112 b	1st Line of Defence	
112 c	2nd Line of Defence	
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)	
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.	
116	If appropriate, provide any additional information/context to the answers in this section.	
<b>12. QUALITY ASSURANCE /COMPLIANCE TESTING</b>		
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.	
<b>13. AUDIT</b>		
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	Governance	
123 d	KYC/CDD/EDD and underlying methodologies	
123 e	Name Screening & List Management	
123 f	Reporting/Metrics & Management Information	
123 g	Suspicious Activity Filing	
123 h	Technology	
123 i	Transaction Monitoring	
123 j	Transaction Screening including for sanctions	
123 k	Training & Education	
123 l	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	
125	Confirm that all responses provided in the above section are representative of all the LE's branches	
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
<b>14. FRAUD</b>		
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.	

### **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)

\_\_\_\_\_ (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.


The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

I, \_\_\_\_\_ (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

I, \_\_\_\_\_ (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)



Financial Institution Name: \_\_\_\_\_  
 Location (Country) : \_\_\_\_\_

No #	Question	Answer
<b>1. ENTITY &amp; OWNERSHIP</b>		
1	Full Legal 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	
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	
6 c	Government or State Owned by 25% or more	
6 d	Privately Owned	
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
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)	

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	
14 e	Investment Banking	
14 f	Financial Markets Trading	
14 g	Securities Services/Custody	
14 h	Broker/Dealer	
14 i	Multilateral Development Bank	
14 j	Wealth Management	
14 k	Other (please explain)	
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)	
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	
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.	
<b>2. PRODUCTS &amp; SERVICES</b>		
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	
19 a1e	Does the Entity allow downstream relationships with foreign banks?	
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTs)?	
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	
19 a1h2	MVTs	
19 a1h3	PSPs	

19 a i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	
19 c	Cross-Border Remittances	
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 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 l	Sponsoring Private ATMs	
19 m	Stored Value Instruments	
19 n	Trade Finance	
19 o	Virtual Assets	
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	
19 p4a	If yes, state the applicable level of due diligence	
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	
<b>3. AML, CTF &amp; SANCTIONS PROGRAMME</b>		
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	Adverse Information Screening	
22 c	Beneficial Ownership	
22 d	Cash Reporting	
22 e	CDD	
22 f	EDD	
22 g	Independent Testing	
22 h	Periodic Review	
22 i	Policies and Procedures	
22 j	PEP Screening	
22 k	Risk Assessment	
22 l	Sanctions	

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.	
<b>4. ANTI BRIBERY &amp; CORRUPTION</b>		
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 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.	
<b>5. AML, CTF &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:	
46 a	Money laundering	
46 b	Terrorist financing	
46 c	Sanctions violations	
47	Are the Entity's policies and procedures updated at least annually?	
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	
48 b1	If Y, does the Entity retain a record of the results?	
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	
49 d	Prohibit accounts/relationships with shell banks	
49 e	Prohibit dealing with another entity that provides services to shell banks	
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	
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	
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	

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

58 e	Name Screening	
58 f	Transaction Screening	
58 g	Training and Education	
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	
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.	
<b>7. KYC, CDD and EDD</b>		
62	Does the Entity verify the identity of the customer?	
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	
64 b	Expected activity	
64 c	Nature of business/employment	
64 d	Ownership structure	
64 e	Product usage	
64 f	Purpose and nature of relationship	
64 g	Source of funds	
64 h	Source of wealth	
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	
65 a1	Are ultimate beneficial owners verified?	
65 b	Authorised signatories (where applicable)	
65 c	Key controllers	
65 d	Other relevant parties	
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	
67	Does the due diligence process result in customers receiving a risk classification?	
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	
67 a2	Geography	
67 a3	Business Type/Industry	
67 a4	Legal Entity type	
67 a5	Adverse Information	
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	
68 a	If Y, is this at:	
68 a1	Onboarding	
68 a2	KYC renewal	
68 a3	Trigger event	
68 a4	Other	
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	
69 a	If Y, is this at:	
69 a1	Onboarding	
69 a2	KYC renewal	

69 a3	Trigger event	
70	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 l	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 and the branch/es that this applies to	
82	If appropriate, provide any additional information/context to the answers in this section.	
<b>8. MONITORING &amp; REPORTING</b>		
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	
84	What is the method used by the Entity to monitor transactions for suspicious activities?	
84 a	If manual or combination selected, specify what type of transactions are monitored manually	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	
84 b2	When was the tool last updated?	
84 b3	When was the automated Transaction Monitoring application last calibrated?	
85	Does the Entity have regulatory requirements to report suspicious transactions?	
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	
<b>9. PAYMENT TRANSPARENCY</b>		
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	
93 b	Local Regulations	
93 b1	If Y, specify the regulation	
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.	
<b>10. SANCTIONS</b>		
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	
102	What is the method used by the Entity for sanctions screening?	
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	
104	What is the method used by the Entity?	

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	
106 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 Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	
107 b	Transactions	
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	
109 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.	
<b>11. TRAINING &amp; EDUCATION</b>		
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	
111 e	Conduct and Culture	
111 f	Fraud	
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	
112 b	1st Line of Defence	
112 c	2nd Line of Defence	
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)	
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.	
116	If appropriate, provide any additional information/context to the answers in this section.	
<b>12. QUALITY ASSURANCE /COMPLIANCE TESTING</b>		
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.	
<b>13. AUDIT</b>		
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	Governance	
123 d	KYC/CDD/EDD and underlying methodologies	
123 e	Name Screening & List Management	
123 f	Reporting/Metrics & Management Information	
123 g	Suspicious Activity Filing	
123 h	Technology	
123 i	Transaction Monitoring	
123 j	Transaction Screening including for sanctions	
123 k	Training & Education	
123 l	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	
125	Confirm that all responses provided in the above section are representative of all the LE's branches	
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
<b>14. FRAUD</b>		
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.	

**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)

\_\_\_\_\_ (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

I, \_\_\_\_\_ (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

I, \_\_\_\_\_ (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)



Financial Institution Name: Banco Bilbao Vizcaya Argentaria S.A.  
 Location (Country) : 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
<b>1. ENTITY &amp; OWNERSHIP</b>		
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)	

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	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	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.	
<b>2. PRODUCTS &amp; SERVICES</b>		
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	No
19 a1	If Y	
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 (MVTs)?	Please select
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	Please select
19 a1h2	MVTs	Please select
19 a1h3	PSPs	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:	
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.	
<b>5. AML, CTF &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:	
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

J/S

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 l	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.	
<b>6. AML, CTF &amp; SANCTIONS RISK ASSESSMENT</b>		
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	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	Governance	Please select
58 c	List Management	Please select
58 d	Management Information	Please select

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19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/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 select
19 e	Hold Mail	No
19 f	International Cash Letter	Please select
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 i5	Other - Please explain	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	Please select
19 l	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 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.	
<b>3. AML, CTF &amp; SANCTIONS PROGRAMME</b>		
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
22 g	Independent Testing	Please select
22 h	Periodic Review	Please select
22 i	Policies and Procedures	Please select
22 j	PEP Screening	Please select
22 k	Risk Assessment	Please select
22 l	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	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.	
<b>4. ANTI BRIBERY &amp; CORRUPTION</b>		
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



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.	
<b>7. KYC, CDD and EDD</b>		
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	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 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	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



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:	
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 l	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	Virtual Asset Service Providers	Do not have this category of customer or industry
76 y	Other (specify)	
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?	No
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	79 - Singapore branch is in to wholesale corporate banking activities and we do not have lawyers, accountants, consultants and real estate agents as customers.
82	If appropriate, provide any additional information/context to the answers in this section.	
<b>8. MONITORING &amp; REPORTING</b>		
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?	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 until port of discharge - subjecting the counter party to pre-clearance process before accepting the transaction - examination 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	1. Combination of manual and automated is for name screening. 2. Manual for identifying suspicious activities
91	If appropriate, provide any additional information/context to the answers in this section.	
<b>9. PAYMENT TRANSPARENCY</b>		
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	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.	
<b>10. SANCTIONS</b>		
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



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)	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.	
<b>11. TRAINING &amp; EDUCATION</b>		
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?	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 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.	
<b>12. QUALITY ASSURANCE /COMPLIANCE TESTING</b>		
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.	
<b>13. AUDIT</b>		
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	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
123 l	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.	
<b>14. FRAUD</b>		
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.	

**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)

Banco Bilbao Vizcaya Argentaria S.A. (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

I, Daniella Savira (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, Viswanathan Subramanian (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.

Daniella SAVIRA  
2024.01.15 16:56:11  
+08'00' (Signature & Date)

V. Subramanian  
15/1/2024 (Signature & Date)





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 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
<b>1. ENTITY &amp; OWNERSHIP</b>		
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 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	Banque de France / ACPR (Autorité 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)	



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	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 customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	Please select
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	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.	
<b>2. PRODUCTS &amp; SERVICES</b>		
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	No
19 a1	If Y	
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 (MVTs)?	Please select
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	Please select
19 a1h2	MVTs	Please select
19 a1h3	PSPs	Please select



19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/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 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 i5	Other - Please explain	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	Please select
19 l	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 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)	
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.	
<b>3. AML, CTF &amp; SANCTIONS PROGRAMME</b>		
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
22 g	Independent Testing	Please select
22 h	Periodic Review	Please select
22 i	Policies and Procedures	Please select
22 j	PEP Screening	Please select
22 k	Risk Assessment	Please select
22 l	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	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.	
<b>4. ANTI BRIBERY &amp; CORRUPTION</b>		
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 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	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)	No
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 branches that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
<b>5. AML, CTF &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:	
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
49 l	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.	
<b>6. AML, CTF &amp; SANCTIONS RISK ASSESSMENT</b>		
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	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	Governance	Please select
58 c	List Management	Please select
58 d	Management Information	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.	
<b>7. KYC, CDD and EDD</b>		
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	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 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	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

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:	
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	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?	Please select
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 j	Non-Government Organisations	Do not have this category of customer or industry
76 k	Non-resident customers	Please select
76 l	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	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 category 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 category of customer or industry
76 u	Travel and Tour Companies	Please 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)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/or compliance approval?	Please select



76 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?	No
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.	We identify beneficial owners according to the requirements of French legislation.
<b>8. MONITORING &amp; REPORTING</b>		
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?	Datamart / MTS
84 b2	When was the tool last updated?	Other - Please explain (in Question 91)
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	
91	If appropriate, provide any additional information/context to the answers in this section.	Tools are maintained and updated by from the parent Company
<b>9. PAYMENT TRANSPARENCY</b>		
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	
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.	
<b>10. SANCTIONS</b>		
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?	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 branches that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	
<b>11. TRAINING &amp; EDUCATION</b>		
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?	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 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.	
<b>12. QUALITY ASSURANCE /COMPLIANCE TESTING</b>		
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.	
<b>13. AUDIT</b>		
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	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
123 l	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.	
<b>14. FRAUD</b>		
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.	

**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)

Banco Bilbao Vizcaya Argentaria S.A. (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

I, \_\_\_\_\_ (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

I, Luis López González (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.

12/12/2023



(Signature &amp; Date)

(Signature &amp; Date)





Financial Institution Name: \_\_\_\_\_  
 Location (Country) : \_\_\_\_\_

No #	Question	Answer
<b>1. ENTITY &amp; OWNERSHIP</b>		
1	Full Legal 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	
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	
6 c	Government or State Owned by 25% or more	
6 d	Privately Owned	
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
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)	

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	
14 e	Investment Banking	
14 f	Financial Markets Trading	
14 g	Securities Services/Custody	
14 h	Broker/Dealer	
14 i	Multilateral Development Bank	
14 j	Wealth Management	
14 k	Other (please explain)	
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)	
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	
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.	
<b>2. PRODUCTS &amp; SERVICES</b>		
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	
19 a1e	Does the Entity allow downstream relationships with foreign banks?	
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTs)?	
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	
19 a1h2	MVTs	
19 a1h3	PSPs	

19 a i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	
19 c	Cross-Border Remittances	
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 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 l	Sponsoring Private ATMs	
19 m	Stored Value Instruments	
19 n	Trade Finance	
19 o	Virtual Assets	
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	
19 p4a	If yes, state the applicable level of due diligence	
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	
<b>3. AML, CTF &amp; SANCTIONS PROGRAMME</b>		
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	Adverse Information Screening	
22 c	Beneficial Ownership	
22 d	Cash Reporting	
22 e	CDD	
22 f	EDD	
22 g	Independent Testing	
22 h	Periodic Review	
22 i	Policies and Procedures	
22 j	PEP Screening	
22 k	Risk Assessment	
22 l	Sanctions	

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.	
<b>4. ANTI BRIBERY &amp; CORRUPTION</b>		
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 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.	
<b>5. AML, CTF &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:	
46 a	Money laundering	
46 b	Terrorist financing	
46 c	Sanctions violations	
47	Are the Entity's policies and procedures updated at least annually?	
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	
48 b1	If Y, does the Entity retain a record of the results?	
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	
49 d	Prohibit accounts/relationships with shell banks	
49 e	Prohibit dealing with another entity that provides services to shell banks	
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	
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	
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	



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

58 e	Name Screening	
58 f	Transaction Screening	
58 g	Training and Education	
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	
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.	
<b>7. KYC, CDD and EDD</b>		
62	Does the Entity verify the identity of the customer?	
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	
64 b	Expected activity	
64 c	Nature of business/employment	
64 d	Ownership structure	
64 e	Product usage	
64 f	Purpose and nature of relationship	
64 g	Source of funds	
64 h	Source of wealth	
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	
65 a1	Are ultimate beneficial owners verified?	
65 b	Authorised signatories (where applicable)	
65 c	Key controllers	
65 d	Other relevant parties	
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	
67	Does the due diligence process result in customers receiving a risk classification?	
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	
67 a2	Geography	
67 a3	Business Type/Industry	
67 a4	Legal Entity type	
67 a5	Adverse Information	
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	
68 a	If Y, is this at:	
68 a1	Onboarding	
68 a2	KYC renewal	
68 a3	Trigger event	
68 a4	Other	
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	
69 a	If Y, is this at:	
69 a1	Onboarding	
69 a2	KYC renewal	

69 a3	Trigger event	
70	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 l	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 and the branch/es that this applies to	
82	If appropriate, provide any additional information/context to the answers in this section.	
<b>8. MONITORING &amp; REPORTING</b>		
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	
84	What is the method used by the Entity to monitor transactions for suspicious activities?	
84 a	If manual or combination selected, specify what type of transactions are monitored manually	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	
84 b2	When was the tool last updated?	
84 b3	When was the automated Transaction Monitoring application last calibrated?	
85	Does the Entity have regulatory requirements to report suspicious transactions?	
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	
<b>9. PAYMENT TRANSPARENCY</b>		
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	
93 b	Local Regulations	
93 b1	If Y, specify the regulation	
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.	
<b>10. SANCTIONS</b>		
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	
102	What is the method used by the Entity for sanctions screening?	
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	
104	What is the method used by the Entity?	

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	
106 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 Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	
107 b	Transactions	
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	
109 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.	
<b>11. TRAINING &amp; EDUCATION</b>		
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	
111 e	Conduct and Culture	
111 f	Fraud	
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	
112 b	1st Line of Defence	
112 c	2nd Line of Defence	
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)	
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.	
116	If appropriate, provide any additional information/context to the answers in this section.	
<b>12. QUALITY ASSURANCE /COMPLIANCE TESTING</b>		
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.	
<b>13. AUDIT</b>		
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	Governance	
123 d	KYC/CDD/EDD and underlying methodologies	
123 e	Name Screening & List Management	
123 f	Reporting/Metrics & Management Information	
123 g	Suspicious Activity Filing	
123 h	Technology	
123 i	Transaction Monitoring	
123 j	Transaction Screening including for sanctions	
123 k	Training & Education	
123 l	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	
125	Confirm that all responses provided in the above section are representative of all the LE's branches	
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
<b>14. FRAUD</b>		
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.	

### **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)

\_\_\_\_\_ (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

I, \_\_\_\_\_ (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

I, \_\_\_\_\_ (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)