the Wolfsberg Group

Financial Institution Name: Location (Country) :

BANCO BILBAO VIZĆAYA ARGENTARIA S.A. SPAIN

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

| No# | Question | Answer |
|-----------|---|--|
| 1. ENTITY | & OWNERSHIP | · · · · · · · · · · · · · · · · · · · |
| 1 | Full Legal Name | BANCO BILBAO VIZCAYA ARGENTARIA S.A |
| 2 | Append a list of foreign branches which are covered by this questionnaire | London, Frankfurt, Brussels, New York, Taipei, Seoul, Paris, Hong Kong, Milán, Tokyo, Singapore, Portugal, Shangai. |
| 3 | Full Legal (Registered) Address | Plaza da San Nicolás, 4- , 48005 - Bilbao |
| 4 | Full Primary Business Address (if different from above) | Calle Azul, 4, 28050, Madrid |
| 5 | Date of Entity incorporation/establishment | Founded in 1857 |
| 6 | Select type of ownership and append an ownership chart if available | |
| 6 a | Publicly Traded (25% of shares publicly traded) | Yes |
| 6 a1 | If Y, indicate the exchange traded on and ticker symbol | BBVA:SM Madrid, Barcelona, Bilbao, Vatencia, London, Mexico, New York. |
| 6 ៦ | Member Owned/Mutua | No |
| 6 c | Government or State Owned by 25% or more | No |
| 6 d | Privately Owned | No |
| 6 d1 | If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more | |
| 7 | % of the Entity's total shares composed of bearer shares | 0% |
| 8 | Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)? | No |
| 8 a | If Y, provide the name of the relevant branch/es which operate under an OBL | |
| | Does the Bank have a Virtual Bank License or provide services only through online channels? | No |
| 10 | Name of primary financial regulator/supervisory authority | BANCO DE ESPAÑA |
| 11 | Provide Legal Entity Identifier (LEI) if available | KBMS7F07N5Z2WQ51AZ71 |
| | Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ) | None |

| 13 | Jurisdiction of licensing authority and regulator of utimate parent | SPAIN |
|--|---|---|
|] | ultimale parent | |
| | | |
| | | |
| 14 | Select the business areas applicable to the Entity | |
| 14 a | Retail Banking | Yes |
| 14 b | Private Banking | Yes |
| 14 ¢ | Commercial Banking | Yes |
| 14 d | Transactional Banking | Yes |
| 14 e | Investment Banking | Yes |
| 14 f | Financial Markets Trading | Yes |
| 14 g | Securities Services/Custody | Yes |
| 14 h | Broker/Dealer | |
| 14 i | Multilateral Development Bank | Yes |
| 14 j | | No |
| 14 k | Wealth Management | Yes |
| 19 K | Other (please explain) | |
| | | |
| | 1 | |
| | | |
| 15 | Does the Entity have a significant (10% or more) | |
| | portfolio of non-resident customers or does it derive | |
| | more than 10% of its revenue from non-resident | |
| | customers? (Non-resident means customers primarily | No v |
| | resident in a different jurisdiction to the location | |
| | where bank services are provided) | |
| 15 a | If V provide the tax for a sure of the | |
| 1019 | If Y, provide the top five countries where the non- | |
| | resident customers are located. | |
| | | |
| | | |
| 16 | Select the closest value: | |
| 16 a | Number of employees | 10001+ |
| 16 b | Total Assets | Greater than \$500 million |
| 17 | Confirm that all responses provided in the above | |
| •• | Section are representative of all the LE's branches. | No |
| <i>(</i> 1 . | | |
| 17 a | If N, clarify which questions the difference/s relate to | Please see annexes for all branches |
| | and the branch/es that this applies to. | |
| | | |
| | J | |
| 18 | If appropriate, provide any additional | |
| | information/context to the answers in this section. | |
| | | |
| | | |
| <u> </u> | | |
| | JCTS & SERVICES | |
| 19 | Does the Entity offer the following products and | |
| | services: | |
| 19 a | Correspondent Banking | Yes |
| 19 a1 | IFY | |
| 19 ata | Does the Entity offer Correspondent Banking | |
| | services to domestic banks? | Yes |
| 19 a1b | Does the Entity allow domestic bank clients to | |
| | | |
| | | Yes |
| 19 210 | provide downstream relationships? | Yes |
| 19 a1c | provide downstream relationships? Does the Entity have processes and procedures | |
| 19 a1c | provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with | Yes |
| | provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? | |
| 19 a1c 19 a1d | provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking | Yes |
| 19 a1d | provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? | |
| | provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships | Yes |
| 19 a1d | provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? | Yes |
| 19 a1d | provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? | Yes |
| 19 a1d 19 a1e | provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures | Yes Yes |
| 19 a1d 19 a1e | provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? | Yes |
| 19 a1d | provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? | Yes Yes |
| 19 a1d 19 a1e | provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking | Yes Yes Yes |
| 19 a1d | provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses | Yes Yes |
| 19 a1d 19 æ1e 19 a1f 19 a1g | provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? | Yes Yes Yes |
| 19 a1d | provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Monay Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity aflow downstream relationships | Yes Yes Yes |
| 19 a1d 19 a1e 19 a1f 19 a1g | provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? | Yes Yes Yes |
| 19 a1d 19 a1e 19 a1f 19 a1g | provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Monay Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity aflow downstream relationships | Yes Yes Yes |
| 19 a1d 19 ø1e 19 a1f 19 a1g 19 a1g | provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity tave processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Monay Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity aflow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? | Yes Yes Yes Yes Yes |
| 19 a1d 19 a1e 19 a1f 19 a1g 19 a1h 9 a1h1 | provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Monay Services Businesses (MSBs)Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? MSBs | Yes Yes Yes Yes No |
| 19 a1d 19 ø1e 19 a1f 19 a1g 19 a1g | provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity tave processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Monay Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity aflow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? | Yes Yes Yes Yes Yes |

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

| 22 m | Suspicious Activity Reporting | Yes |
|--------|---|---|
| 22 n | Training and Education | Yes |
| 22 0 | Transaction Monitoring | Yes |
| 23 | How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? | 101-500 |
| 24 | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Quastion 29. | No |
| 25 | Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme? | Yes |
| 26 | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? | Yes |
| 26 a | If Y, provide further details | Only one company 100% owned by the group, for back office and administrative tasks |
| 27 | Does the entity have a whistleblower policy? | |
| 28 | Confirm that all responses provided in the above | Yes |
| 28 a | Section are representative of all the LE's branches | No |
| 20 4 | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | Please see annexes for all branches |
| 29 | If appropriate, provide any additional information/context to the answers in this section. | Clarification #24: It is composed of several policles reviewed on an ongoing basis. Not necessarily every year, but some with a higher frequency. Approved at the level required by internal governance |
| 4. ANT | I BRIBERY & CORRUPTION | |
| 30 | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? | Yes |
| 31 | Does the Entity have an enterprise wide programme that sets minimum ABC standards? | Yes |
| 32 | Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? | Yes |
| 33 | Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? | Yes |
| 34 | Is the Entity's ABC programme applicable to: | Both joint ventures and third parties acting on behalf of the Entity |
| 35 | Does the Entity have a global ABC policy that; | |
| 35 a | Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage. | Yes |
| 35 b | Includes enhanced requirements regarding interaction with public officials? | Yes |
| 35 c | Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? | Yes |
| 36 | Does the Entity have controls in place to monitor the effectiveness of their ABC programme? | Yes |
| 37 | Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? | Yes |
| 18 | Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? | Yes |
| 8 a | If N, provide the date when the last ABC EWRA was completed. | |
| 9 | Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? | Yes |
| 10 | Does the Entity's ABC EWRA cover the inherent risk components detailed below; | Yes |
| 0 a | Potential liability created by intermediaries and | |

| 40 b | | |
|--|--|---|
| 40 15 | Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries | Yes |
| 40 c | Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials | Y85 |
| 40 d | Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions | Yes |
| 40 e | Changes in business activities that may materially increase the Entity's corruption risk | Yes |
| 41 | Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures? | Yes |
| 42 | Does the Entity provide mandatory ABC training to: | |
| 42 a | Board and senior Committee Management | Yes |
| 42 b | 1st Line of Defence | Yes |
| 42 c | 2nd Line of Defence | Yes |
| 42 d | 3rd Line of Defence | Yes |
| 42 e | Third parties to which specific compliance activities subject to ABC risk have been outsourced | Yea |
| 42 f | Non-employed workers as appropriate (contractors/consultants) | Yes |
| 43 | Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities? | Yes |
| 44 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Yes |
| 44 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 45 | If appropriate, provide any additional information/context to the answers in this section. | Regarding question 42F, It should be noted that BBVA does not provide training to all non employed workers but it does provide training to certain high risk non-employed workers such as agents. BBVA requires all its third parties to certify their commitment to comply with all applicable anticorruption laws. |
| 5. AML, C | IF & SANCTIONS POLICIES & PROCEDURES | |
| | | |
| 46 | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: | · · · · · · · · · · · · · · · · · · · |
| | consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: | |
| 46 a | consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering | Yes |
| 46 a 46 b | consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing | Yes |
| 46 a 46 b 46 c | consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations | |
| 46 a 46 b 46 c 47 | consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? | Yes |
| 46 a 46 b 46 c 47 48 | consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: | Yes Yes |
| 46 a 46 b 46 c 47 48 48 | consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards | Yes Yes Yes Yes Yes |
| 46 a 46 b 46 c 47 48 48 48 a 48 a | consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? | Yes Yes Yes No |
| 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a | consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards | Yes Yes Yes No Yes |
| 46 a 46 b 46 c 47 48 48 48 a 48 a 48 a 48 b 48 b | consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? | Yes Yes Yes No |
| 46 a 46 b 46 c 47 48 48 48 a 48 a 48 a 48 b 48 b 48 b 49 | consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: | Yes Yes Yes No Yes |
| 46 a 46 b 46 c 47 48 48 48 a 48 a 48 a 48 a 48 b 48 b 49 a | consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts | Yes Yes Yes No Yes |
| 46 a 46 b 46 c 47 48 48 48 a 48 a 48 a 48 b 48 b 48 b 49 | consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and ficilious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs | Yes Yes Yes No Yes Yes Yes |
| 46 a 46 b 46 c 47 48 48 48 a 48 a 48 a 48 a 48 b 48 b 49 a | consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts | Yes Yes Yes Yes No Yes Yes Yes |
| 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 48 b 49 b 49 b | consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs | Yes Yes |
| 46 a 46 b 46 c 47 48 48 48 a 48 a 48 b 48 b 48 b 49 b 49 a 49 c | consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBF is | Yes Yes Yes Yes No Yes Yes Yes Yes Yes |
| 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b 48 b 49 b 49 a 49 c 49 d | consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks | Yes |
| 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 49 49 a 49 a 49 c 49 c 49 d 49 e | consistent with applicable AML, CTF & Sanclions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and ficilitous named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entities that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unficensed/unregulated remitance agents, | Yes Yes Yes Yes |

| 491 | Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees | Yes |
|--------------|---|--|
| 49 j | Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk | Yes |
| 49 k | Define the process for exiting clients for financial crime reasons that applies across the entity, Including foreign branches and affiliates | Yes |
| 491 | Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship | Yes |
| 49 m | Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News | Yes |
| 49 n | Outline the processes for the maintenance of internal "watchlists" | Yes |
| 50 | Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business? | Yes |
| 51 | Does the Entity have record retention procedures that comply with applicable laws? | Yes |
| 51 a | If Y, what is the retention period? | |
| | | 5 years or more |
| 52 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Yes |
| 52 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 53 | If appropriate, provide any additional Information/context to the answers in this section. | clarification #48 a): BBVA Sanctions policies comply with OFAC regulations. Other AML policies are not gapped against US standards necessarily. |
| 6 ABB C3 | IF & SANCTIONS RISK ASSESSMENT | |
| 54 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: | |
| 54 a | Client | Yes |
| 54 b | Product | Yes |
| 54 c | Channel | Yes |
| 54 d | Geography | Yes |
| 55 | Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: | |
| 55 a | Transaction Monitoring | Yes |
| 55 b | Customer Due Diligence | Yes |
| 55 c 55 d | PEP Identification Transaction Screening | Yes |
| 55 e | Name Screening against Adverse Media/Negative News | Yes Yes |
| 55 / | Training and Education | Yes |
| 55 g | Governance | Yas |
| 55 h | Management Information | Yes |
| 56 | Has the Entity's AML & CTF EWRA been completed in the last 12 months? | Yes |
| 56 a | If N, provide the date when the last AML & CTF EWRA was completed, | |
| 57 | Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: | in a constant of the state of t |
| 57 a | Client | Yes |
| 57 b | Product | Yes |
| 57 ¢ | Channei | Yes |
| 57 d | Geography | Yes |
| 58 | Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below; | |
| 58 a | Customer Due Diligence | Yes |
| 58 b | | |
| EQ 4 | Governance | Yes |
| 58 c 56 d | Governance List Management Management Information | Yes Yes |

| 58 e | Name Screening | Yes |
|----------------|---|---|
| 58 f | Transaction Screening | Yes |
| 56 g | Training and Education | Yes |
| 59 | Has the Entity's Sanctions EWRA been completed in | Yes |
| | the last 12 months? | |
| 59 a | If N, provide the date when the last Sanctions | |
| | EWRA was completed. | |
| | | |
| ļ | | ļ. |
| 60 | Confirm that all responses provided in the above | |
| | Section are representative of all the LE's branches | Yes |
| 60 a | If N, clarify which questions the difference/s relate to | |
| 000 | and the branch/es that this applies to. | |
| | and the warming matches appression | |
| | | |
| . . | | |
| 61 | If appropriate, provide any additional | |
| | Information/context to the answers in this section. | |
| | | |
| | | |
| 7. KYC. (| CDD and EDD | |
| 62 | Does the Entity verify the identity of the customer? | Yes |
| 63 | Do the Enlity's policies and procedures set out when | |
| | CDD must be completed, e.g. at the time of | Yes |
| | onboarding or within 30 days? | 163 |
| 64 | Which of the following does the Entity gather and | |
| 57 | retain when conducting CDD? Select all that apply; | |
| 64.0 | Customer identification | |
| 64 a | | Yes |
| 64 b | Expected activity | Yes |
| 64 c | Nature of business/employment | Yes |
| 64 d | Ownership structure | Yes |
| 64 e | Product usage | Yes |
| 64 f | Purpose and nature of relationship | Yes |
| 64 g | Source of funds | Yes |
| 64 h | Source of wealth | Yes |
| 65 | Are each of the following identified: | |
| 65 a | Ultimate beneficial ownership | Yes |
| 65 a1 | Are ultimate beneficial owners verified? | Yes |
| 65 b | Authorised signatories (where applicable) | Yes |
| 65 c | Key controllers | Yes |
| 65 d | Other relevant parties | No |
| 66 | What is the Entity's minimum (lowest) threshold | |
| | applied to beneficial ownership identification? | 25% |
| 67 | Does the due diligence process result in customers | |
| 07 | receiving a risk classification? | Yas |
| £7 a | If Y, what factors/criter/e are used to determine the | |
| 67 a | • · · · · · · · · · · · · · · · · · · · | |
| ATT - 1 | customer's dsk classification? Select all that apply: | |
| 67 a1 | Product Usage | Yes |
| 67 a2 | Geography | Yes |
| 67 a3 | Business Type/Industry | Yes |
| 67 a4 | Legal Enlity type | Yes |
| 67 a5 | Adverse Information | Yes |
| 67 a6 | Other (specify) | Lenghl of the relationship and AMI, screenings |
| | | rengnt of the relationship alto Awar, screetlings |
| | 1 | |
| | 1 | |
| 68 | For high risk non-individual customers, is a site visit a | |
| | part of your KYC process? | Yes |
| 68 a | If Y, is this at: | |
| 68 a 1 | Onboarding | |
| 68 a2 | KYC renewal | Yes |
| 68 a2 68 a3 | | Yes |
| | Trigger event | Yes |
| 68 84 | Other | Yes |
| 68 a4a | If yes, please specify "Other" | irregular operations |
| | | |
| | | |
| | | |
| 69 | Does the Entity have a risk based approach to | |
| | screening customers for Adverse Media/Negative | Yes |
| | News? | |
| 69 a | If Y, is this at: | |
| 69 a1 | Onboarding | Yes |
| 69 a2 | KYC renewal | |
| | | Yes |

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

| 78 a | If Vindicate who provides the expressel: | D.4 | |
|-------------|--|--|--|
| | If Y indicate who provides the approval: | Both | |
| 79 | Does the Entity have specific procedures for | | |
| | onboarding entities that handle client money such as | Yes | |
| | lawyers, accountants, consultants, real estate agents? | | |
| 80 | Does the Entity perform an additional control or | | |
| | quality review on clients subject to EDD? | Yes | |
| 81 | Confirm that all responses provided in the above | | |
| a 1 | Section are representative of all the LE's branches | No | |
| | - | | |
| 81 a | If N, clarify which questions the difference/s relate to | See annexes for Belgium, Germany, Hong Kong, London, Milan, Paris, Singapora and Taiwan | |
| | and the branch/es that this applies to | branches. | |
| 1 | | | |
| | | | |
| | | | |
| 82 | If appropriate, provide any additional | #65c: Key controllers are identified when they coincide with the Spanish law concept of beneficial | |
| | information/context to the answers in this section. | owners (over 25%), | |
| | ĺ | | |
| | | | |
| 0 MONITO | DRING & REPORTING | | |
| 6. (NOIVITC | | - · · · · · · · · · · · · · · · · · · · | |
| 83 | Does the Entity have risk based policies, procedures | | |
| | and monitoring processes for the identification and | Yes | |
| | reporting of suspicious activity? | | |
| | | | |
| 84 | What is the method used by the Entity to monitor | | |
| 1 | Iransactions for suspicious activities? | Automated | |
| | | | |
| 84 a | If manual or combination selected, specify what | | |
| | type of transactions are monitored manually | | |
| | | | |
| | | | |
| | | | |
| | If automated or combination selected, are internal | Vendor-sourced tools | |
| 84 b | system or vendor-sourced tools used? | | |
| 0464 | Kit fan den en waard in alt en Diatiel ander de die die d | | |
| 84 b1 | If Vendor-sourced tool' or 'Both' selected, what is | SAS AML | |
| | the name of the vendor/tool? | | |
| | | | |
| | | | |
| 04 1-0 | Nipop was the to all last us date d? | | |
| 84 b2 | When was the tool last updated? | < 1 year | |
| 4460 | When was the outernal of Transceller Menitering | | |
| 84 b3 | When was the automated Transaction Monitoring application last collibrated? | < 1 year | |
| | application last calibrated? | | |
| 0.E | Does the Entity have regulatory requirements to | | |
| 85 | report suspicious transactions? | Yes | |
| | | | |
| | If X does the Estitution collision preseduate and | | |
| 85 a | If Y, does the Entity have policies, procedures and | N | |
| | processes to comply with suspicious transaction | Yes | |
| | reporting requirements? | | |
| | | | |
| 86 | Does the Entity have policies, procedures and | | |
| | processes to review and escalate matters arising from | Yes | |
| | the monitoring of customer transactions and activity? | | |
| | | | |
| 87 | Does the Entity have a data quality management | | |
| | programme to ensure that complete data for all | Yes | |
| | transactions are subject to monitoring? | | |
| | | | |
| | Does the Entity have processes in place to respond | | |
| | to Request For Information (RFIs) from other entities | Yes | |
| | in a timely manner? | | |
| | | | |
| | Does the Entity have processes in place to send | | |
| | Requests for Information (RFIs) to their customers in | Yes | |
| | a limely manner? | | |
| 90 | Confirm that all responses provided in the above | | |
| | Section are representative of all the LE's branches | Yes | |
| 90 a | If N, clarify which questions the difference/s relate to | | |
| | and the branch/es that this applies to | See annexes for branches | |
| | and are branchines that ons applies to | | |
| | | | |
| | | | |
| 91 | If appropriate, provide any additional | | |
| | information/context to the answers in this section. | | |
| | | | |
| 1 | | | |
| | | | |
| 9. PAYMEN | P. PAYMENT TRANSPARENCY | | |
| | Does the Enlity adhere to the Wolfsberg Group | | |
| | Payment Transparency Standards? | Yes | |
| | - J | | |

| 93 | Does the Entity have policies, procedures and processes to comply with and have controls in place | |
|---------|--|--------------------------|
| | to ensure compliance with: | |
| 93 a | FATF Recommendation 16 | Yes |
| 93 b | Local Regulations | Yes |
| 93 b1 | If Y, specify the regulation | EU Regulation 847/2015 |
| 93 c | lí N, explain | |
| 94 | Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages? | Yes |
| 95 | Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages? | Yes |
| 95 a | If Y, does the Entity have procedures to include beneficiary address including country in cross border payments? | Yes |
| 96 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Yeş |
| 96 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | See annexes for branches |
| 97 | If appropriate, provide any additional information/context to the answers in this section. | |
| 10. SAN | CTIONS | |
| 96 | Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? | Yes |
| 99 | Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (Including prohibitions within the other entity's local jurisdiction)? | No |
| 100 | Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? | Yaş |
| 101 | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? | Yes |
| 102 | What is the method used by the Entity for senctions screening? | Automated |
| 102 a | If 'automated' or 'both automated and manual' selected: | |
| 102 a1 | Are internal system of vendor-sourced tools used? | Both |
| 102 a1a | If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? | FIRCOSOFT |
| 102 a2 | When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110) | < 1 year |
| 103 | Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? | Yes |
| 104 | What is the method used by the Entity? | Automaled |

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

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

| Does the Entity have real time monitoring to detect fraud? Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. | Yes Yes | |
|--|--|--|
| additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | | |
| section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional | Yes | |
| and the branch/es that this applies to. If appropriate, provide any additional | | |
| | | |
| | | |
| up Correspondent Banking Due Diligence Questionnaire 2023 (CE latement (To be signed by Global Head of Correspondent Bank | ing or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of | |
| remain in full compliance with all applicable financial crime laws | on name) is fully committed to the fight against financial crime and makes s, regulations and standards in all of the jurisdictions in which it does business and holds accounts. re and sustainable controls to combat financial crime in order to protect its reputation and to meet its | |
| legal and regulatory obligations. The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards. | | |
| The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months. | | |
| Institution commits to file accurate supplemental information on | a timely basis. | |
| (Obbai Head c | f Correspondent Banking or equivalent), certify that I have read and understood this declaration, that my honest belief, and that I am authorised to execute this declaration on behalf of the Financial | |
| Institution. EDUARDO GARDE (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this | | |
| IL <u>EDUARDO GARDE</u> (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution. (Signature & Date) (Signature & Date) (II/13) 20 23 | | |
| | aundering, Chief Compliance Officer, Global Head of Financial AO VIZCAYA ARGENTARIA, S.A. (Financial Institution remain in full compliance with all applicable financial crime laws Institution understands the critical importance of having effective latory obligations. Institution recognises the importance of transparency regarding Institution further certifies it complies with / is working to complete on provided in this Wolfsberg CBDDQ will be kept current and we Institution commits to file accurate supplemental information on GALIANA (Global Head of provided in this Wolfsberg CBDDQ are complete and correct to O GARDE (MLRO or equited) DDQ are complete and correct to my honest belief, and that I a | |

the Wolfsberg Group

Financial Institution Name: Location (Country) :

| | No# | Question | Answer |
|-----|--------|--|--------|
| 1. | ENTITY | & OWNERSHIP | |
| 1 | | Full Legal Name | |
| 1 | | Tuli Legar Name | |
| | | | |
| | | | |
| | | | |
| 2 | | Append a list of foreign branches which are covered | |
| | | by this questionnaire | |
| | | | |
| | | | |
| | | | |
| 3 | | Full Legal (Registered) Address | |
| | | | |
| | | | |
| | | | |
| _ | | | |
| 4 | | Full Primary Business Address (if different from | |
| | | above) | |
| | | | |
| | | | |
| 5 | | Date of Entity incorporation/establishment | |
| 5 | | Bate of Entry moorporation/establishinent | |
| | | | |
| | | | |
| | | | |
| 6 | | Select type of ownership and append an ownership | |
| | | chart if available | |
| 6 8 | 9 | Publicly Traded (25% of shares publicly traded) | |
| | | If Y, indicate the exchange traded on and ticker | |
| 6 | a I | | |
| | | symbol | |
| | | | |
| | | | |
| 6 | h | Member Owned/Mutual | |
| 6 | | Government or State Owned by 25% or more | |
| 6 | | Privately Owned | |
| | | | |
| 6 | a1 | If Y, provide details of shareholders or ultimate | |
| | | beneficial owners with a holding of 10% or more | |
| | | | |
| | | | |
| 7 | | % of the Entity's total shares composed of bearer | |
| - | | shares | |
| | | 310103 | |
| | | | |
| | | | |
| 8 | | Does the Entity, or any of its branches, operate under | |
| | | an Offshore Banking License (OBL)? | |
| 8 ; | 9 | If Y, provide the name of the relevant branch/es | |
| - | - | which operate under an OBL | |
| | | | |
| | | | |
| | | | |
| 9 | | Does the Bank have a Virtual Bank License or | |
| | | provide services only through online channels? | |
| 10 |) | Name of primary financial regulator/supervisory | |
| | | authority | |
| | | | |
| | | | |
| | | | |
| 11 | | Provide Legal Entity Identifier (LEI) if available | |
| | | | |
| | | | |
| | | | |
| | | | |
| 12 | | Provide the full legal name of the ultimate parent (if | |
| | | different from the Entity completing the DDQ) | |
| | | | |
| | | | |
| | | | |

| 40 | Installed a construction of the second | |
|-----------|---|--|
| 13 | Jurisdiction of licensing authority and regulator of | |
| | ultimate parent | |
| | | |
| | | |
| | | |
| | | |
| 14 | Select the business areas applicable to the Entity | |
| 14 a | Retail Banking | |
| 14 b | Private Banking | |
| | | |
| 14 c | Commercial Banking | |
| 14 d | Transactional Banking | |
| | <u> </u> | |
| 14 e | Investment Banking | |
| 14 f | Financial Markets Trading | |
| | , and the second s | |
| 14 g | Securities Services/Custody | |
| 14 h | Broker/Dealer | |
| 14 i | Multilateral Development Bank | |
| | • | |
| 14 j | Wealth Management | |
| 14 k | Other (please explain) | |
| 14 K | Otilei (piease explain) | |
| | | |
| | | |
| | | |
| | | |
| 15 | Does the Entity have a significant (10% or more) | |
| 15 | | |
| | portfolio of non-resident customers or does it derive | |
| | more than 10% of its revenue from non-resident | |
| 1 | customers? (Non-resident means customers primarily | |
| 1 | | |
| | resident in a different jurisdiction to the location | |
| 1 | where bank services are provided) | |
| 1 | . , | |
| 15 a | If Y, provide the top five countries where the non- | |
| 15 4 | | |
| | resident customers are located. | |
| | | |
| | | |
| | | |
| 16 | Select the closest value: | |
| | | |
| 16 a | Number of employees | |
| 16 b | Total Assets | |
| | | |
| 17 | Confirm that all responses provided in the above | |
| | Section are representative of all the LE's branches. | |
| 17 a | If N algorify which guagations the difference (a relate to | |
| 17 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to. | |
| | | |
| | | |
| | | |
| 10 | | |
| 18 | If appropriate, provide any additional | |
| | information/context to the answers in this section. | |
| | | |
| | | |
| | | |
| | | |
| 2. PRODUC | CTS & SERVICES | |
| 19 | Does the Entity offer the following products and | |
| | services: | |
| | | |
| 19 a | Correspondent Banking | |
| 19 a1 | IfY | |
| | | |
| 19 a1a | Does the Entity offer Correspondent Banking | |
| | services to domestic banks? | |
| | | |
| 19 a1b | Does the Entity allow domestic bank clients to | |
| 1 | provide downstream relationships? | |
| 40.4 | | |
| 19 a1c | Does the Entity have processes and procedures | |
| | in place to identify downstream relationships with | |
| | domestic banks? | |
| | | |
| 19 a1d | Does the Entity offer Correspondent Banking | |
| | services to foreign banks? | |
| L | Ĵ | |
| 19 a1e | Does the Entity allow downstream relationships | |
| | with foreign banks? | |
| | <u> </u> | |
| 19 a1f | Does the Entity have processes and procedures | |
| | in place to identify downstream relationships with | |
| | | |
| | foreign banks? | |
| 19 a1g | Does the Entity offer Correspondent Banking | |
| Jany | | |
| 1 | services to regulated Money Services Businesses | |
| 1 | (MSBs)/Money Value Transfer Services (MVTSs)? | |
| 10 - 11 | | |
| 19 a1h | Does the Entity allow downstream relationships | |
| | with MSBs, MVTSs, or Payment Service Provider | |
| | (PSPs)? | |
| L | | |
| 19 a1h1 | MSBs | |
| 19 a1h2 | | |
| | MVTSs | |
| 19 a1h3 | PSPs | |

| 19 a1i | Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs? | |
|--|---|--|
| 19 b | Cross-Border Bulk Cash Delivery | |
| 19 c | Cross-Border Remittances | |
| 19 c 19 d | Domestic Bulk Cash Delivery | |
| | | |
| 19 e | Hold Mail | |
| 19 f | International Cash Letter | |
| 19 g | Low Price Securities | |
| 19 h | Payable Through Accounts | |
| 19 i | Payment services to non-bank entities who may | |
| 101 | then offer third party payment services to their customers? | |
| 19 i1 | If Y, please select all that apply below? | |
| 19 i2 | Third Party Payment Service Providers | |
| 19 i3 | Virtual Asset Service Providers (VASPs) | |
| 19 i4 | eCommerce Platforms | |
| - | | |
| 19 i5 | Other - Please explain | |
| 19 j | Private Banking | |
| 19 k | Remote Deposit Capture (RDC) | |
| 19 I | Sponsoring Private ATMs | |
| 19 m | Stored Value Instruments | |
| 19 m | Trade Finance | |
| 19 0 | Virtual Assets | |
| | | |
| 19 p | For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence: | |
| 19 p1 | Check cashing service | |
| 19 p1a | If yes, state the applicable level of due diligence | |
| 19 p2 | Wire transfers | |
| 19 p2a | If yes, state the applicable level of due diligence | |
| 19 p2a 19 p3 | | |
| | Foreign currency conversion | |
| 19 p3a | If yes, state the applicable level of due diligence | |
| 19 p4 | Sale of Monetary Instruments | |
| 19 p4a | If yes, state the applicable level of due diligence | |
| | | |
| 19 p5 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. | |
| | If you offer other services to walk-in customers please provide more detail here, including | |
| 19 p5 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by | |
| 19 p5 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above | |
| 19 p5 19 q 20 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to | |
| 19 p5 19 q 20 20 a 21 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. | |
| 19 p5 19 q 20 20 a 21 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the | |
| 19 p5 19 q 20 20 a 21 3. AML, C1 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum | |
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| 19 p5 19 q 20 20 a 21 3. AML, C1 22 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise | |
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| 19 p5 19 p5 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership | |
| 19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 c 22 d | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting | |
| 19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 c 22 c 22 c 22 c | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD | |
| 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c 22 c 22 c 22 c 22 c 22 c 22 c 22 c | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting | |
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| 19 p5 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c 22 c 22 c 22 c 22 c 22 c 22 d 22 c 22 d 22 c 22 d 22 c | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review | |
| 19 p5 19 p5 19 q 20 20 a 21 22 a 22 a 22 a 22 c 22 c | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures | |
| 19 p5 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c 22 d 22 c 22 c 22 f 22 g 22 f 22 g 22 h 22 j | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening | |
| 19 p5 19 p5 19 q 20 a 20 a 21 a 22 a 22 a 22 b 22 c 22 d 22 c 22 d 22 c 22 d 22 g 22 h 22 i 22 j 22 k | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment | |
| 19 p5 19 p5 19 q 20 20 a 21 22 a 22 a 22 b 22 c 22 c 22 d 22 c 22 f 22 g 22 f 22 g 22 h 22 i 22 j | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening | |

| 22 m | Suspicious Activity Reporting | |
|-----------|---|--|
| 22 n | Training and Education | |
| 22 o | Transaction Monitoring | |
| 23 | How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? | |
| 24 | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29. | |
| 25 | Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme? | |
| 26 | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? | |
| 26 a | If Y, provide further details | |
| 27 | Does the entity have a whistleblower policy? | |
| 28 | Confirm that all responses provided in the above Section are representative of all the LE's branches | |
| 28 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 29 | If appropriate, provide any additional information/context to the answers in this section. | |
| 4. ANTI E | RIBERY & CORRUPTION | |
| 30 | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? | |
| 31 | Does the Entity have an enterprise wide programme that sets minimum ABC standards? | |
| 32 | Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? | |
| 33 | Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? | |
| 34 | Is the Entity's ABC programme applicable to: | |
| 35 | Does the Entity have a global ABC policy that: | |
| 35 a | Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage. | |
| 35 b | Includes enhanced requirements regarding interaction with public officials? | |
| 35 c | Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? | |
| 36 | Does the Entity have controls in place to monitor the effectiveness of their ABC programme? | |
| 37 | Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? | |
| 38 | Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? | |
| 38 a | If N, provide the date when the last ABC EWRA was completed. | |
| 39 | Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? | |
| 40 | Does the Entity's ABC EWRA cover the inherent risk components detailed below: | |
| 40 a | Potential liability created by intermediaries and other third-party providers as appropriate | |

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

| 49 i | Define the process for escalating financial crime risk issues/potentially suspicious activity identified by | |
|--|---|--|
| | employees | |
| 49 j | Define the process, where appropriate, for | |
| - | terminating existing customer relationships due to financial crime risk | |
| 49 k | Define the process for exiting clients for financial | |
| | crime reasons that applies across the entity, including foreign branches and affiliates | |
| 49 I | Define the process and controls to identify and | |
| | handle customers that were previously exited for | |
| | financial crime reasons if they seek to re-establish a relationship | |
| 49 m | Outline the processes regarding screening for | |
| | sanctions, PEPs and Adverse Media/Negative News | |
| 49 n | Outline the processes for the maintenance of internal "watchlists" | |
| 50 | Has the Entity defined a risk tolerance statement or | |
| | similar document which defines a risk boundary around their business? | |
| 51 | Does the Entity have record retention procedures that | |
| • | comply with applicable laws? | |
| 51 a | If Y, what is the retention period? | |
| | | |
| | | |
| 52 | Confirm that all means any ideal in the above | |
| 32 | Confirm that all responses provided in the above Section are representative of all the LE's branches | |
| 52 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to. | |
| | | |
| | | |
| 53 | If appropriate, provide any additional information/context to the answers in this section. | |
| | | |
| | | |
| | | |
| 6. AML. CTF | & SANCTIONS RISK ASSESSMENT | |
| 6. AML, CTF 54 | & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the | |
| 54 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: | |
| 54 54 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client | |
| 54 54 a 54 b | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product | |
| 54 a 54 b 54 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel | |
| 54 a 54 b 54 c 54 d | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography | |
| 54 a 54 b 54 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel | |
| 54 a 54 b 54 c 54 d 55 55 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring | |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 b | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence | |
| 54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification | |
| 54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c 55 c 55 d | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening | |
| 54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification | |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education | |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance | |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information | |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance | |
| 54 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 d 55 d 55 d 55 d 55 d 55 f 55 g 55 h 56 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? | |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed | |
| 54 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 d 55 d 55 d 55 d 55 d 55 f 55 g 55 h 56 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF | |
| 54 54 a 54 b 54 c 55 a 55 a 55 b 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the Iast 12 months? If N, provide the date when the Iast AML & CTF EWRA was completed. | |
| 54 54 a 54 b 54 c 55 a 55 a 55 b 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent | |
| 54 54 a 54 b 54 c 54 d 55 a 55 a 55 c 55 c 55 d 55 c 55 d 55 c 55 f 55 f 55 h 56 a 57 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: | |
| 54 54 a 54 b 54 c 54 d 55 a 55 a 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client | |
| 54 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 c 55 c 55 d 55 c 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 c 57 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product | |
| 54 54 a 54 b 54 c 54 d 55 a 55 a 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel | |
| 54 54 a 54 b 54 c 54 d 55 a 55 a 55 a 55 c 55 c 57 c 57 c 57 c 57 c 57 c 57 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product | |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 d 55 f 55 g 55 h 56 57 57 a 57 b 57 c 57 d 58 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | |
| 54 54 a 54 b 54 c 55 a 55 b 55 b 55 c 55 c 55 d 55 c 55 d 55 f 55 f 55 h 56 57 57 a 57 d 57 d 58 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | |
| 54 54 a 54 b 54 c 55 a 55 b 55 c 55 d 55 c 55 d 55 f 55 g 55 h 56 a 57 c 57 d 58 a 58 b | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance | |
| 54 54 a 54 b 54 d 55 a 55 b 55 c 55 d 55 c 55 d 55 f 55 f 55 h 56 57 57 a 57 d 57 d 58 58 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | |

| 58 e | Name Careening | |
|----------------|---|--|
| 58 f | Name Screening | |
| 58 f 58 g | Transaction Screening Training and Education | |
| 58 g 59 | Has the Entity's Sanctions EWRA been completed in the last 12 months? | |
| 50 - | | |
| 59 a | If N, provide the date when the last Sanctions EWRA was completed. | |
| 60 | Confirm that all responses provided in the above Section are representative of all the LE's branches | |
| 60 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to. | |
| 61 | If appropriate, provide any additional information/context to the answers in this section. | |
| 7. KYC, C | DD and EDD | |
| 62 | Does the Entity verify the identity of the customer? | |
| 63 | Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days? | |
| 64 | Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: | |
| 64 a | Customer identification | |
| 64 b | Expected activity | |
| 64 c | Nature of business/employment | |
| 64 d | Ownership structure | |
| 64 e | Product usage | |
| 64 f | Purpose and nature of relationship Source of funds | |
| 64 g 64 h | Source of runds Source of wealth | |
| 65 | Are each of the following identified: | |
| 65 a | Ultimate beneficial ownership | |
| 65 a1 | Are ultimate beneficial owners verified? | |
| 65 b | Authorised signatories (where applicable) | |
| 65 c | Key controllers | |
| 65 d | Other relevant parties | |
| 66 | What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? | |
| 67 | Does the due diligence process result in customers receiving a risk classification? | |
| 67 a | If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: | |
| 67 a1 | Product Usage | |
| 67 a2 67 a3 | Geography | |
| 67 a3 67 a4 | Business Type/Industry Legal Entity type | |
| 67 a4 | Adverse Information | |
| 67 a6 | Other (specify) | |
| 68 | For high risk non-individual customers, is a site visit a part of your KYC process? | |
| 68 a | If Y, is this at: | |
| 68 a1 | Onboarding | |
| 68 a2 | KYC renewal | |
| 68 a3 68 a4 | Trigger event Other | |
| 68 a4a | If yes, please specify "Other" | |
| 69 | Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? | |
| 69 a | If Y, is this at: | |
| 69 a1 | Onboarding | |
| 69 a2 | KYC renewal | |

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

| 78 a | If Y indicate who provides the approval: | |
|-----------|---|--|
| 79 | Does the Entity have specific procedures for | |
| | onboarding entities that handle client money such as | |
| | lawyers, accountants, consultants, real estate agents? | |
| 80 | Does the Entity perform an additional control or quality review on clients subject to EDD? | |
| 81 | Confirm that all responses provided in the above Section are representative of all the LE's branches | |
| 81 a | If N, clarify which questions the difference/s relate to | |
| 01 a | and the branch/es that this applies to | |
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| 82 | If appropriate, provide any additional information/context to the answers in this section. | |
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| | | |
| | | |
| 8. MONITO | DRING & REPORTING | |
| 83 | Does the Entity have risk based policies, procedures | |
| | and monitoring processes for the identification and | |
| | reporting of suspicious activity? | |
| 04 | What is the method used by the Entity to monitor | |
| 84 | transactions for suspicious activities? | |
| <u> </u> | | |
| 84 a | If manual or combination selected, specify what | |
| | type of transactions are monitored manually | |
| | | |
| | | |
| 84 b | If automated or combination selected, are internal system or vendor-sourced tools used? | |
| | | |
| 84 b1 | If 'Vendor-sourced tool' or 'Both' selected, what is | |
| | the name of the vendor/tool? | |
| | | |
| | | |
| 84 b2 | When was the tool last updated? | |
| 04 62 | When was the outemated Transaction Manitaring | |
| 84 b3 | When was the automated Transaction Monitoring application last calibrated? | |
| | | |
| 85 | Does the Entity have regulatory requirements to | |
| | report suspicious transactions? | |
| 85 a | If Y, does the Entity have policies, procedures and | |
| 05 a | processes to comply with suspicious transaction | |
| | reporting requirements? | |
| - | | |
| 86 | Does the Entity have policies, procedures and | |
| | processes to review and escalate matters arising from | |
| | the monitoring of customer transactions and activity? | |
| 87 | Does the Entity have a data quality management | |
| -· | programme to ensure that complete data for all | |
| | transactions are subject to monitoring? | |
| | Deep the Entity have processes in place to reason it | |
| 88 | Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities | |
| | in a timely manner? | |
| | | |
| 89 | Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in | |
| | a timely manner? | |
| 90 | Confirm that all responses provided in the above | |
| | Section are representative of all the LE's branches | |
| 90 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to | |
| | | |
| | | |
| 91 | If appropriate, provide any additional | |
| | information/context to the answers in this section. | |
| | | |
| | | |
| 9. PAYME | NT TRANSPARENCY | |
| 92 | Does the Entity adhere to the Wolfsberg Group | |
| 1 | Payment Transparency Standards? | |

| 93 | Does the Entity have policies, procedures and | |
|----------|--|--|
| 55 | | |
| | processes to comply with and have controls in place | |
| | to ensure compliance with: | |
| 93 a | FATF Recommendation 16 | |
| 93 b | Local Regulations | |
| 93 b1 | If Y, specify the regulation | |
| 55 51 | | |
| 93 c | If N, explain | |
| | | |
| 94 | Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages? | |
| 95 | Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages? | |
| 95 a | If Y, does the Entity have procedures to include beneficiary address including country in cross border payments? | |
| 96 | Confirm that all responses provided in the above Section are representative of all the LE's branches | |
| 96 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 97 | If appropriate, provide any additional information/context to the answers in this section. | |
| 10. SANC | TIONS | |
| 98 | Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? | |
| 99 | Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)? | |
| 100 | Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? | |
| 101 | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? | |
| 102 | What is the method used by the Entity for sanctions screening? | |
| 102 a | If 'automated' or 'both automated and manual' selected: | |
| 102 a1 | Are internal system of vendor-sourced tools used? | |
| 102 a1a | If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? | |
| 102 a2 | When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110) | |
| 103 | Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? | |
| 104 | What is the method used by the Entity? | |

| | - | |
|-------|--|--|
| 105 | Does the Entity have a data quality management | |
| | programme to ensure that complete data for all | |
| | transactions are subject to sanctions screening? | |
| | | |
| 106 | Select the Sanctions Lists used by the Entity in its | |
| | sanctions screening processes: | |
| 106 a | Consolidated United Nations Security Council | |
| 100 u | Sanctions List (UN) | |
| | | |
| 106 b | United States Department of the Treasury's Office of | |
| | Foreign Assets Control (OFAC) | |
| 106 c | Office of Financial Sanctions Implementation HMT | |
| | (OFSI) | |
| | | |
| 106 d | European Union Consolidated List (EU) | |
| 106 e | Lists maintained by other G7 member countries | |
| 106 f | Other (specify) | |
| | (| |
| | | |
| | | |
| | | |
| 107 | When regulatory authorities make updates to their | |
| 101 | Sanctions list, how many business days before the | |
| | | |
| | entity updates their active manual and/or automated | |
| | screening systems against: | |
| 107 a | Customer Data | |
| 107 b | Transactions | |
| 107 5 | | |
| 100 | Does the Entity have a physical presence, e.g. | |
| | branches, subsidiaries, or representative offices | |
| | located in countries/regions against which UN, OFAC, | |
| | OFSI, EU or G7 member countries have enacted | |
| | comprehensive jurisdiction-based Sanctions? | |
| 109 | Confirm that all responses provided in the above | |
| 100 | Section are representative of all the LE's branches | |
| 100 | | |
| 109 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to. | |
| | | |
| | | |
| 110 | lf annun viete, mussiale en verdeltienel | |
| 110 | If appropriate, provide any additional | |
| | information/context to the answers in this section. | |
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| | | |
| | | |
| | G & EDUCATION | |
| 111 | Does the Entity provide mandatory training, which | |
| | includes: | |
| 111 a | Identification and reporting of transactions to | |
| | government authorities | |
| 111 b | Examples of different forms of money laundering, | |
| | terrorist financing and sanctions violations relevant | |
| | for the types of products and services offered | |
| | for the types of products and services offered | |
| | | |
| 111 c | Internal policies for controlling money laundering, | |
| | terrorist financing and sanctions violations | |
| 111 d | New issues that occur in the market, e.g. significant | |
| | regulatory actions or new regulations | |
| | | |
| 111 e | Conduct and Culture | |
| 111 f | Fraud | |
| 112 | Is the above mandatory training provided to: | |
| 112 a | Board and Senior Committee Management | |
| 112 b | 1st Line of Defence | |
| | 2nd Line of Defence | |
| 112 c | | |
| 112 d | 3rd Line of Defence | |
| 112 e | Third parties to which specific FCC activities have | |
| | been outsourced | |
| 112 f | Non-employed workers (contractors/consultants) | |
| 1121 | | |
| 113 | Does the Entity provide AML, CTF & Sanctions training | |
| | that is targeted to specific roles, responsibilities and | |
| | high-risk products, services and activities? | |
| 114 | Does the Entity provide customised training for AML, | |
| | CTF and Sanctions staff? | |
| 114 a | If Y, how frequently is training delivered? | |
| 115 | Confirm that all responses provided in the above | |
| | Section are representative of all the LE's branches | |
| | | |

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

| 129 | Does the Entity have real time monitoring to detect fraud? | |
|---------------|--|---|
| 130 | Do the Entity's processes include gathering | |
| | additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID? | |
| 131 | Confirm that all responses provided in the above | |
| | section are representative of all the LE's branches | |
| 131 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to. | |
| | | |
| 132 | If appropriate, provide any additional | |
| | information/context to the answers in this section. | |
| | | |
| | | |
| | | |
| | | |
| Declarati | on Statement | |
| Wolfsberg Gr | oup Correspondent Banking Due Diligence Questionnaire 2023 (Cl | |
| Declaration S | Statement (To be signed by Global Head of Correspondent Banl | xing or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of |
| Anti- Money | Laundering, Chief Compliance Officer, Global Head of Financial | Crimes Compliance OR equivalent) |
| | | |
| | | ion name) is fully committed to the fight against financial crime and makes |
| every enort t | to remain in fuil compliance with all applicable financial crime laws | s, regulations and standards in all of the jurisdictions in which it does business and holds accounts. |
| | | ve and sustainable controls to combat financial crime in order to protect its reputation and to meet its |
| legal and reg | ulatory obligations. | |
| | al Institution recognises the importance of transparency regardir | g parties to transactions in international payments and has adopted/is committed to adopting these |
| standards. | | |
| | al Institution further certifies it complies with / is working to complion provided in this Wolfsberg CBDDQ will be kept current and v | y with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. vill be updated no less frequently than every eighteen months. |
| The Financia | al Institution commits to file accurate supplemental information or | a timely basis |
| | | |
| | (Global Head | of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that |
| the answers | | my honest belief, and that I am authorised to execute this declaration on behalf of the Financial |
| Institution. | | |
| I, | | ivalent), certify that I have read and understood this declaration, that the answers provided in this |
| Wolfsberg C | BDDQ are complete and correct to my honest belief, and that I a | am authorised to execute this declaration on behalf of the Financial Institution. |
| | | |
| | (Signature & Dat | e) |
| | \mathbb{V} | |
| | \rightarrow | |
| | (Signature & Dat | e) |
| | l. | |
| | | |

the Wolfsberg Group

Financial Institution Name: Location (Country) :

Name: BBVA Bank Talwan

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office, This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

| No# | Question | Answer | |
|-----------|--|---|----------|
| 1. ENTITY | & OWNERSHIP | | |
| 1 | Full Legal Name | | |
| 1. | i di Eoga Hano | BBVA Bank | |
| | | | |
| | | | |
| | | | |
| 2 | Append a list of foreign branches which are covered | Taipei branch | |
| | by this questionnaire | | |
| | | | |
| | | | |
| 3 | Full Legal (Registered) Address | Unit D, Level 45, Taipel 101 Tower, No.7 Xinyi Rd, Sec 5, Talpei City11049, Taiwan, ROC | |
| | | | |
| | | | |
| | | | |
| 4 | Full Primary Business Address (If different from | | |
| | above) | | |
|] | | | |
| | | | |
| 5 | Date of Entity incorporation/establishment | 110000011 | |
| ľ | but of ching most providence and an and | 11/23/2011 | |
| | | | |
| | | | |
| - | | | |
| 6 | Select type of ownership and append an ownership chart if available | | |
| | | | |
| 6 a | Publicly Traded (25% of shares publicly Iraded) | Please select | |
| 6 a 1 | If Y, indicate the exchange traded on and ticker | | |
| | symbol | | |
| | | | |
| | | | |
| 6 b | Member Owned/Mutual | | . |
| 6 c | Government or State Owned by 25% or more | Please select | Ε |
| 6 d | Privalely Owned | Please select | |
| 6 d1 | If Y, provide details of shareholders or ultimate | | |
| | beneficial owners with a holding of 10% or more | | |
| | | | |
| | | | |
| 7 | % of the Entity's total shares composed of bearer | | |
| | shares | | |
| | | | |
| | | | |
| 8 | Does the Enlity, or any of its branches, operate under | | |
| - | an Olíshore Banking License (OBL)? | Please select | |
| 8a | If Y, provide the name of the relevant branch/es | |] |
| v. | which operate under an OBL | | i |
| | | | |
| | | | |
| | | | |
| | Does the Bank have a Virtual Bank License or | Please select | |
| | provide services only through online channels? | | |
| 10 | Name of primary financial regulator/supervisory | Financial Supervisory Committee (FSC) | |
| | authority | | |
| | | | |
| | | | |
| 11 | Provide Legal Entity Identifier (LEI) if available | | |
| | | | ſ |
| | | | |
| | | | |
| 12 | Provide the full legal name of the ultimate parent (if | | |
| | different from the Entity completing the DDQ) | | |
| | | | |
| | | | |
| · · · | | | |

| | | · · · · · · · · · · · · · · · · · · · |
|------------------|--|--|
| 13 | Jurisdiction of licensing authority and regulator of | |
| | ultimate parent | |
| | | |
| | | |
| 14 | Select the business areas applicable to the Entity | · · · · · · · · · · · · · · · · · · · |
| 14 a | Retail Banking | No |
| 14 b | Private Banking | |
| 14 c | Commercial Banking | No Lats |
| 14 d | | |
| | Transactional Banking | Yes Control Yes |
| 14 e | Investment Banking | No |
| 14 (| Financial Markets Trading | No |
| 14 g | Securities Services/Custody | No Line Line Line Line Line Line Line Line |
| 14 h | Broker/Dealer | No |
| 141 | Multitateral Development Bank | No Y |
| 14 j | Wealth Management | No |
| - | ÷ | NO |
| 14 k | Other (please explain) | |
| | | |
| | | |
| | | |
| 15 | Does the Entity have a significant (10% or more) | |
| | portícia of non-resident customers or does it derive | |
| | more than 10% of its revenue from non-resident | |
| | customers? (Non-resident means customers primarily | No |
| | resident in a different jurisdiction to the location | |
| | where bank services are provided) | |
| | witere park services die brovided) | |
| 15 a | If Y, provide the top five countries where the non- | |
| | resident customers are located. | |
| - | | |
| | | |
| | | |
| 16 | Select the closest value; | |
| 16 a | Number of employees | 1-50 |
| 16 b | Total Assets | Between \$10 and \$100 million |
| 17 | | Between \$10 and \$100 million |
| 14 | Confirm that all responses provided in the above | Please select |
| | Section are representative of all the LE's branches. | |
| 17 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to. | |
| | | |
| | | |
| | - · · · · · · · · · · · · · · · · · · · | |
| 18 | If appropriate, provide any additional | |
| | information/context to the answers in this section, | |
| | | |
| | | |
| | | |
| | JCTS & SERVICES | |
| 19 | Does the Entity offer the following products and | |
| | services: | |
| 19 a | Correspondent Banking | No |
| 19 a1 | ПY | |
| 19 a1a | | |
| | Does the Enlity offer Correspondent Banking services to domestic banks? | Please seloci |
| | | |
| 19 a1b | Does the Entity allow domestic bank clients to | Please select |
| | provide downstream relationships? | |
| 19 a1c | Does the Entity have processes and procedures | |
| | in place to identify downstream relationships with | Please select |
| | domeslic banks? | |
| 40 - 1 I | | |
| 19 a1d | Does the Entity offer Correspondent Banking | Please select |
| | services to foreign banks? | |
| 19 a1e | Does the Entity allow downstream relationships | Place estat |
| | with foreign banks? | Please select |
| 19 a1(| Does the Enlity have processes and procedures | |
| | in place to identify downstream relationships with | |
| | foreign banks? | No |
| | | |
| 19 a1g | Does the Entity offer Correspondent Banking | |
| | services to regulated Money Services Businesses | No |
| | (MSBs)/Money Value Transfer Services (MVTSs)? | |
| 19 a1h | Does the Entity allow downstream relationships | |
| | with MSBs, MVTSs, or Payment Service Provider | |
| | (PSPs)? | |
| | | |
| 19 a 1 h1 | MSBs | No |
| 19 a1h2 | MVTSs | No |
| 19 a1h3 | PSPs | No C |
| | r · · | less less less les les les les les les l |

| 19 a1i 19 b 19 c 19 c 19 d 19 d 19 f 19 f 19 j 19 j 19 j 19 j 19 j 19 j 19 j 19 j | Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs? Cross-Border Bulk Cash Delivery Cross-Border Remittances Domestic Bulk Cash Delivery Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their | No No Contraction of the second secon |
|---|---|--|
| 19 c 19 d 19 e 19 f 19 g 19 h 19 i 19 i1 19 i2 | MSBs /MVTSs/PSPs? Cross-Border Bulk Cash Delivery Cross-Border Remittances Domestic Bulk Cash Delivery Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their | No Carlor |
| 19 c 19 d 19 e 19 f 19 g 19 h 19 i 19 i1 19 i2 | Cross-Border Bulk Cash Delivery Cross-Border Remittances Domestic Bulk Cash Delivery Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their | Yes Carlor |
| 19 c 19 d 19 e 19 f 19 g 19 h 19 i 19 i1 19 i2 | Cross-Border Remittances Domestic Bulk Cash Delivery Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their | Yes Carlor |
| 19 c 19 d 19 e 19 f 19 g 19 h 19 i 19 i 19 i 19 i 19 i 19 i 19 i 19 i | Cross-Border Remittances Domestic Bulk Cash Delivery Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their | Yes |
| 19 d 19 e 19 f 19 g 19 h 19 i 19 i 19 i 19 i 19 i 19 i 19 i 19 i | Domestic Bulk Cash Delivery Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their | No Contraction Con |
| 19 e 19 f 19 g 19 h 19 i 19 i 19 i 19 i 19 i 19 i 19 i 19 i | Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their | No Carlor |
| 19 f 19 g 19 h 19 i 19 i 19 i 19 i 19 i 19 i 19 i 19 i | International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their | No |
| 19 g 19 h 19 h 19 i 19 i 19 i 19 i 19 i 19 i 2 | Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their | No |
| 19 h 19 i 19 i 19 i1 19 i2 | Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their | |
| 19 i 19 i1 19 i2 | Payment services to non-bank entities who may then offer third party payment services to their | |
| 19 i1 19 i2 | Payment services to non-bank entities who may then offer third party payment services to their | |
| 19 i1 19 i2 | then offer third party payment services to their | |
| 19 i2 | customers? | No |
| 19 i2 | | <u>ــا</u> |
| | If Y, please select all that apply below? | |
| | Third Party Payment Service Providers | No |
| 19 13 | Virtual Asset Service Providers (VASPs) | No |
| 19 i4 | eCommerce Platforms | No G |
| 19 15 | Other - Please explain | |
| | Oures - riease explain | |
| | | |
| 19 j | Private Banking | No E |
| 19 k | Remote Deposit Capture (RDC) | No La |
| 191 | Sponsoring Private ATMs | |
| | , , | |
| 19 m | Stored Value Instruments | No |
| 19 n | Trade Finance | Yes |
| 19 0 | Virlual Assels | No |
| 19 p | For each of the following please state whether you | |
| | offer the service to walk in customers and if so, the applicable level of due diligence: | |
| 19 p1 | Check cashing service | No E |
| 19 p1a | If yes, state the applicable level of due diligence | |
| | | Please solect |
| 19 p2 | Wire transfers | Yes |
| 19 p2a | If yes, state the applicable level of due diligence | Identification |
| 19 p3 | Foreign currency conversion | No |
| 19 p3a | If yes, slate the applicable level of due diligence | Please select |
| 19 p4 | Sale of Monetary Instruments | No |
| 19 p4a | If yes, state the applicable level of due diligence | Please select |
| 19 p5 | If you offer other services to walk-in customers | |
| | please provide more delai! here, including describing the level of due diligence, | |
| 19 q | Other high-risk products and services identified by | |
| 14 1 | the Entity (please specify) | |
| | | |
| | Confirm that all responses provided in the above | Please select |
| 20 a | Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to. | |
| | | |
| | If appropriate, provide any additional information/context to the answers in this section. | |
| | | |
| | F & SANCTIONS PROGRAMME | La |
| | Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: | |
| | | |
| í | Appointed Officer with sufficient experience/experting | Diasea salaci |
| í 22 a | Appointed Officer with sufficient experience/expertise | Pléase select |
| í 22 a 22 b | Adverse Information Screening | Please select |
| 1 22 a 22 b 22 c | Adverse Information Screening Beneficial Ownership | Please select Please select |
| 1 22 a 22 b 22 c 22 d | Adverse Information Screening Beneficial Ownership Cash Reporting | Please select |
| 1 22 a 22 b 22 c 22 d | Adverse Information Screening Beneficial Ownership | Please select Please select |
| 1 22 a 22 b 22 c 22 d 22 e | Adverse Information Screening Beneficial Ownership Cash Reporting | Please select Please select Please select Please select Please select Please select |
| 1 22 a 22 b 22 c 22 d 22 d 22 e 22 f | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD | Please select |
| 1 22 a 22 b 22 c 22 d 22 d 22 e 22 f 22 f 22 g | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing | Please select Please select Please select Please select Please select Please select |
| 1 22 a 22 b 22 c 22 d 22 d 22 e 22 f 22 g 22 g 22 h | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review | Please select |
| f 22 a 22 b 22 c 22 d 22 c 22 d 22 e 22 f 22 g 22 h 22 2 h 22 2 h 22 2 h 22 1 22 1 | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures | Please select |
| 1 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 i | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening | Please select |
| í 22 a | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures | Please select |

| 22 m | Suspicious Activity Reporting | Please soloct |
|----------|---|---------------------------------------|
| 22 n | Training and Education | Please select |
| 22 0 | Transaction Monitoring | Please select |
| 23 | How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? | 11-100 |
| 24 | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29. | Please select |
| 25 | Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme? | Please select |
| 26 | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? | No |
| 26 a | If Y, provide further details | |
| 27 | Does the entity have a whistleblower policy? | Please select |
| 28 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 28 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 29 | If appropriate, provide any additional information/context to the answers in this section. | Talpei branch does not dea) with Cash |
| 4. ANTIE | BRIBERY & CORRUPTION | |
| 30 | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? | Please select |
| 31 | Does the Entity have an enterprise wide programme that sets minimum ABC standards? | No |
| 32 | Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? | Please select |
| 33 | Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? | Please select |
| 34 | Is the Enlity's ABC programme applicable to: | Nol Applicable |
| 35 | Does the Entity have a global ABC policy that: | |
| 35 a | Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly. if improperly intended to influence action or obtain an advantage. | Please select |
| 35 b | Includes enhanced requirements regarding interaction with public officials? | Please select |
| 35 c | Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? | Please select |
| 36 | Does the Entity have controls in place to monitor the effectiveness of their ABC programme? | Please select |
| 37 | Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? | Ploase select |
| 38 | Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? | Please select |
| 38 a | If N, provide the date when the last ABC EWRA was completed. | |
| 39 | Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? | No |
| 40 | Does the Entity's ABC EWRA cover the inherent risk components detailed below: | Please select |
| 40 a | Potential liability created by intermediaries and other third-party providers as appropriate | Please select |

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

| 491 | Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees | Please solect |
|----------|---|---------------|
| 49 j | Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk | Ploase select |
| 49 K | Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and alfiliates | Please select |
| 491 | Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship | Please select |
| 49 m | Oulline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News | Please select |
| 49 n | Oulline the processes for the maintenance of internal "watchlists" | Please select |
| 50 | Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business? | Please select |
| 51 | Does the Entity have record retention procedures that comply with applicable laws? | Please select |
| 51 a | If Y, what is the retention period? | Please select |
| 52 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 52 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 53 | If appropriate, provide any additional information/context to the answers in this section. | |
| 6 AML CT | F & SANCTIONS RISK ASSESSMENT | |
| 54 | Does the Enlity's AML & CTF EWRA cover the inherent risk components detailed below; | |
| 54 a | Client | Please select |
| 54 b | Product | Please select |
| 54 c | Channe! | Please select |
| 54 d | Geography | Please select |
| 55 | Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: | |
| 55 a | Transaction Monitoring | Please select |
| 55 b | Customer Due Dillgence | Please select |
| 55 с | PEP Identification | Please select |
| 55 đ | Transaction Screening | Please solect |
| 55 e | Name Screening against Adverse Media/Negalive News | Please select |
| 55 f | Training and Education | Please select |
| 55 g | Governance | Please select |
| 55 h | Management Information | Ploase select |
| 56 | Has the Entity's AML & CTF EWRA been completed in the last 12 months? | Please select |
| 56 a | If N, provide the date when the last AML & CTF EWRA was completed. | |
| 57 | Does the Enlity's Sanctions EWRA cover the inherent risk components detailed below; | |
| 57 a | Client | Please select |
| 57 b | Product | Please seleci |
| 57 C | Channel | Please select |
| 57 d | Geography | Please select |
| 58 | Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | |
| 58 a | Cuslomer Due Diligence | Please select |
| 58 b | Governance | Please select |
| 58 c | ListManagement | Please select |
| | Listmanagement | |
| 58 d | Management Information | Please select |

| | | r ^a |
|----------------|---|----------------|
| 58 e | Name Screening | Please select |
| 58 f | Transaction Screening | Please select |
| 58 g | Training and Education | Please select |
| 59 | Has the Enlity's Sanctions EWRA been completed in the last 12 months? | Please select |
| 59 a | If N, provide the date when the last Sanctions EWRA was completed. | |
| 60 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please solect |
| 60 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 61 | If appropriate, provide any additional information/context to the answers in this section. | |
| 7. KYC. C | DD and EDD | |
| 62 | Does the Entity verify the identity of the customer? | Please select |
| 63 | Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days? | Please select |
| 64 | Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: | |
| 64 a | Customer identification | Please select |
| 64 b | Expected activity | Please select |
| 64 c | Nature of business/employment | Please select |
| 64 d | Ownership structure | Please sclect |
| 64 e 64 f | Product usage | Please select |
| 64 g | Purpose and nature of relationship Source of funds | Please select |
| 64 g 64 h | Source of wealth | Please select |
| 65 | Are each of the following identified: | Please select |
| 65 a | Ullimate beneficial ownership | |
| 65 a1 | Are ultimate beneficial owners verified? | Please select |
| 65 b | Authorised signatories (where applicable) | Please select |
| 65 c | Key controllers | Please select |
| 65 d | Other relevant parties | Please select |
| 66 | What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? | Please select |
| 67 | Does the due diligence process result in customers receiving a risk classification? | Please select |
| 67 a | if Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: | |
| 67 a 1 | Product Usage | Please select |
| 67 a2 | Geography | Please select |
| 67 a3 | Business Type/Industry | Please select |
| 67 a4 | Legal Enlity type | Please select |
| 67 a5 67 a6 | Adverse Information | Please select |
| 6 <i>1</i> 40 | Other (specify) | |
| 68 | For high risk non-individual customers, is a site visit a part of your KYC process? | Please select |
| 68 a | If Y, is this at: | |
| 68 a1 68 a2 | Onboarding KYC renewal | Please select |
| 68 a2 68 a3 | Trigger evant | Please select |
| 68 a4 | Other | Please select |
| 68 a4a | If yes, please specify "Other" | Please select |
| 69 69 | Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? | Please solect |
| 69 a 69 a1 | If Y, is this at: Onboarding | |
| 69 a1 | KYC renewal | Please select |
| 70 GT | | Please select |

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| | | or compliance approval? | Please select |

| 78 a | If Y indicate who provides the approval: | Please select |
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| 79 | Does the Entity have specific procedures for | |
| | onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents? | Please select |
| 80 | Does the Entity perform an additional control or quality review on clients subject to EDD? | Please select |
| 81 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 81a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to | |
| 82 | If appropriate, provide any additional information/context to the answers in this section, | |
| 8. MONIT | I ORING & REPORTING | |
| 83 | Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity? | Please select |
| 64 | What is the method used by the Entity to monitor transactions for suspicious activilies? | Combination of automaled and manual |
| 84 a | If manual or combination selected, specify what type of transactions are monitored manually | |
| 84 b | If automated or combination selected, are internal system or vendor-sourced tools used? | Please select |
| 84 b1 | If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool? | |
| 84 b 2 | When was the tool last updated? | Ploase select |
| 84 b3 | When was the automated Transaction Monitoring application last calibrated? | Please select |
| 85 | Does the Entity have regulatory requirements to report suspicious transactions? | Please select |
| 8 5 a | If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? | Please select |
| 86 | Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? | Please select |
| 87 | Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? | Please select |
| 88 | Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? | Please select |
| 89 | Does the Enlity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? | Please select |
| 90 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Ploase select |
| 90 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to | |
| 91 | If appropriate, provide any additional information/context to the answers in this section. | |
| | | |
| 92 | Does the Enlity adhere to the Wolfsberg Group | |
| | Payment Transparency Standards? | Please select |

| 93 Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: 93 a FATF Recommendation 16 Please select 93 b Local Regulations Please select 93 b1 (FY, specify the regulation Please select 93 c If N, explain Please select 93 c If N, explain Please select 94 Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages? Please select 95 Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages? Please select 95 a If Y, doas the Entity have procedures to include beneficiary address including country in cross border payment messages? Please select 95 a If Y, doas the Entity have procedures to include beneficiary address including country in cross border payments? Please select 96 Confirm that all responses provided in the above Section are representative of all the LE's branches Please select 96 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. Please select | |
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| 93 b Local Regulations Please solect 93 b1 If Y, specify the regulation If N, explain 93 c If N, explain Please solect 93 d Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages? Please select 95 Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages? Please select 95 a If Y, does the Entity have procedures to include beneficiary address including country in cross border payment messages? Please select 96 Confirm that all responses provided in the above Section are representative of all the LE's branches Please select 96 a If N, clarify which questions the differenco/s relate to and the branch/es that this applies to. Please select | |
| 93 b Local Regulations Please solect 93 b1 If Y, specify the regulation If N, explain 93 c If N, explain Please solect 93 d Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages? Please select 95 Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages? Please select 95 a If Y, does the Entity have procedures to include beneficiary address including country in cross border payment messages? Please select 96 Confirm that all responses provided in the above Section are representative of all the LE's branches Please select 96 a If N, clarify which questions the differenco/s relate to and the branch/es that this applies to. Please select | ······ |
| 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 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. | |
| 93 c If N, explain 94 Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages? 95 Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages? 95 Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages? 95 Does the Entity have procedures to include beneficiary information cross-border payment messages? 95 a If Y, does the Entity have procedures to include beneficiary address including country in cross border payments? 96 Confirm that all responses provided in the above Section are representative of all the LE's branches 96 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
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| of required beneficiary information cross-border payment messages? Please select 95 a If Y, does the Entity have procedures to include beneficiary address including country in cross border payments? Please select 96 Confirm that all responses provided in the above Section are representative of all the LE's branches Please select 96 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. Please select | |
| beneficiary address including country in cross border payments? Please select 96 Confirm that all responses provided in the above Section are representative of all the LE's branches Please select 96 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. Please select | |
| Section are representative of all the LE's branches Please select 96 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| and the branch/es that this applies to. | |
| | |
| 97 If appropriate, provide any additional information/context to the answers in this section, | |
| 10. SANCTIONS | |
| 98 Does the Enlity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Enlity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? | |
| 99 Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)? | |
| 100 Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions laken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? Please select | |
| 101 Does the Enlity screen Its customers, including beneficial ownership information collected by the Enlity, during onboarding and regularly thereafter against Sanctions Lists? Please select | |
| 102 What is the method used by the Entity for sanctions screening? | |
| 102 a If 'automated' or 'both automated' and manual' selected; | |
| 102 a1 Are internal system of vendor-sourced tools used? Please select | |
| 102 a1a If a 'vendor-sourced loof' or 'both' selected, what is the name of the vendor/loof? | |
| 102 a2 When did you last test the effectiveness (of finding Irue matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110) | |
| 103 Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? Please select | |
| 104 What is the method used by the Entity? Please select | |

;

| 105 | Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening? | Please select |
|----------------|--|-----------------|
| 106 | Select the Sanctions Lists used by the Entity in its sanctions screening processes: | |
| 106 a | Consolidated United Nations Security Council Sanctions List (UN) | Please select |
| 106 b | United States Department of the Treasury's Office of Foreign Assets Control (OFAC) | Please select |
| 106 c | Office of Financial Sanctions Implementation HMT (OFSI) | Please select |
| 106 d | European Union Consolidated List (EU) | Piease salect |
| 106 e | Lisis maintained by other G7 member countries | Please select |
| 106 f | Other (specify) | |
| 107 | When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against: | |
| 107 a | Customer Data | Please select |
| 107 b | Transactions | Please select |
| 108 | Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions? | Please select |
| 109 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 109 a | II N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 110 | If appropriate, provide any additional Information/context to the answers in this section. | |
| 11. TRAININ | G & EDUCATION | |
| 111 | Does the Entity provide mandatory training, which includes: | |
| 111 a | Idenlification and reporting of transactions to government authorities | Please select |
| 111 b | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered | Please select |
| 111 c | Internal policies for controlling money laundering, terrorist financing and sanctions violations | Please select |
| 111 d | New issues that occur in the market, e.g. significant regulatory actions or new regulations | Please select |
| 111 e | Conduct and Culture | Please solect |
| 111 f | Fraud | Please select |
| 112 112 a | Is the above mandatory training provided to: Board and Senior Committee Management | Disease as feed |
| 112 a 112 b | 1st Line of Defence | Piease select |
| 112 c | 2nd Line of Defence | Please select |
| 112 d | 3rd Line of Defence | Please select |
| 112 e | Third parties to which specific FCC activities have been outsourced | Please select |
| 112 f | Non-employed workers (contractors/consultants) | Piease select |
| 113 | Does the Entity provide AML, CTF & Sanctions training that is largeled to specific roles, responsibilities and high-risk products, services and activities? | Please select |
| 114 | Does the Entity provide customised training for AML, CTF and Sanctions staff? | Please select |
| 114 a | IFY, how frequently is training delivered? | Please select |
| 115 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |

| 115 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
|----------------|--|-----------------------------|
| | | |
| 116 | If appropriate, provide any additional information/context to the answers in this section. | |
| | | |
| | TY ASSURANCE /COMPLIANCE TESTING | |
| 117 | Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)? | Please select |
| 118 | Does the Entity have a program wide risk based Compliance Testing process (separate from the indopendent Audit function)? | Please select |
| 119 | Confirm that all responses provided in the above Section are representative of all the LE's branchos | Please select |
| 119 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to, | |
| 120 | If appropriate, provide any additional information/context to the answers in this section. | |
| 13. AUDIT | | |
| 121 | In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a lesting function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? | Please solect |
| 122 | How often is the Enlity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: | |
| 122 a | Internal Audit Department | Please select |
| 122 b | External Third Party | Please select |
| 123 | Does the internal audit function or other independent third party cover the following areas; | |
| 123 a | AML, CTF, ABC, Fraud and Sanctions policy and procedures | Picase select |
| 123 b | Enterprise Wide Risk Assessment | Please select |
| 123 c 123 d | Governance | Picase select |
| 123 c | KYC/CDD/EDD and underlying methodologies Name Screening & List Management | Please select |
| 123 f | Reporting/Metrics & Management Information | Please select Please select |
| 123 g | Suspicious Activity Filing | Please select |
| 123 h | Technology | Please select |
| 123 i | Transaction Monitoring | Please select |
| 123 j | Transaction Screening including for sanctions | Please select |
| 123 k | Training & Education | Please select |
| 1231 | Other (specify) | |
| 124 | Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? | Please select |
| 125 | Confirm that all responses provided in the above section are representative of all the LE's branches | Please select |
| 125 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 126 | If appropriate, provide any additional information/context to the answers in this section, | |
| 4. FRAU | D | |
| 127 | Does the Entity have policies in place addressing fraud risk? | Piease seleci |
| 128 | Does the Entity have a dedicated learn responsible for preventing & detecting fraud? | Please solect |
| | | |

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

Declaration Statement

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

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

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

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

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

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

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

the Wolfsberg Group

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

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire at the legal entry level including LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

| No# | Question | Answer |
|-----------|---|---|
| 1. ENTITY | & OWNERSHIP | in the second |
| 1 | Full Legal Name | Banco Bilbao Vizcaya Argentaria S.A. |
| 2 | Append a list of foreign branches which are covered by this questionnaire | Banco Bilbao Vizcaya Argentaria S.A., Niederlassung Deutschland |
| 3 | Full Legal (Registered) Address | Neue Mainzer Str. 28, 60311 Frankfurt am Main |
| 4 | Full Primary Business Address (if different from above) | |
| 5 | Date of Entity incorporation/establishment | 2007 |
| 6 | Select type of ownership and append an ownership chart if available | |
| 6 a | Publicly Traded (25% of shares publicly traded) | Please select |
| 6 a1 | If Y, indicate the exchange traded on and ticker symbol | |
| 6 b | Member Owned/Mutual | Please select |
| 6 c | Government or State Owned by 25% or more | Please select |
| 6 d | Privately Owned | Please select |
| 6 d1 | If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more | |
| 7 | % of the Entity's total shares composed of bearer shares | |
| 8 | Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)? | Please select |
| 8 a | If Y, provide the name of the relevant branch/es which operate under an OBL | |
| 9 | Does the Bank have a Virtual Bank License or provide services only through online channels? | Please select |
| 10 | Name of primary financial regulator/supervisory authority | |
| 11 | Provide Legal Entity Identifier (LEI) if available | |
| 12 | Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ) | |

| 13 | Jurisdiction of licensing authority and regulator of | |
|----------|---|--|
| | ultimate parent | |
| | | |
| | | |
| | | |
| 14 | Select the business areas applicable to the Entity | |
| 14 a | Retail Banking | No |
| 14 b | Private Banking | No |
| 14 c | Commercial Banking | Please select |
| 14 d | Transactional Banking | |
| | | Please select |
| 14 e | Investment Banking | Please select |
| 14 f | Financial Markets Trading | Please select |
| 14 g | Securities Services/Custody | No |
| 14 h | Broker/Dealer | No |
| 14 i | Multilateral Development Bank | Please select |
| 14 j | Wealth Management | No |
| 14 k | Other (please explain) | NO |
| 14 K | Other (please explain) | |
| | | |
| | | |
| | | |
| 15 | Does the Entity have a significant (10% or more) | |
| | portfolio of non-resident customers or does it derive | |
| 1 | more than 10% of its revenue from non-resident | |
| | customers? (Non-resident means customers primarily | Please select |
| | | |
| | resident in a different jurisdiction to the location where bank services are provided) | |
| | where bank services are provided) | |
| 15 a | If Y, provide the top five countries where the non- | |
| | resident customers are located. | |
| | resident customers are located. | |
| | | |
| | | |
| 16 | Select the closest value: | |
| 16 a | Number of employees | 1-50 |
| 16 b | Total Assets | |
| | | Please select |
| 17 | Confirm that all responses provided in the above | Please select |
| | Section are representative of all the LE's branches. | - 10030 3010U |
| 17 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to. | |
| | | |
| | | |
| | | |
| 18 | If appropriate, provide any additional | |
| | information/context to the answers in this section. | |
| | | |
| | | |
| | | |
| | JCTS & SERVICES | |
| 19 | Does the Entity offer the following products and | |
| | services: | |
| 19 a | Correspondent Banking | No |
| 19 a1 | IfY | NU |
| | | |
| 19 a1a | Does the Entity offer Correspondent Banking | Please select |
| | services to domestic banks? | |
| 19 a1b | Does the Entity allow domestic bank clients to | |
| | provide downstream relationships? | Please select |
| 19 a1c | Does the Entity have processes and procedures | |
| 13 410 | in place to identify downstream relationships with | |
| | | Please select |
| | domestic banks? | |
| 19 a1d | Does the Entity offer Correspondent Banking | |
| | services to foreign banks? | Please select |
| 19 a1e | Does the Entity allow downstream relationships | |
| | with foreign banks? | Please select |
| 10 -11 | | |
| 19 a1f | Does the Entity have processes and procedures | |
| | in place to identify downstream relationships with | Please select |
| | foreign banks? | |
| 19 a1g | Does the Entity offer Correspondent Banking | |
| | services to regulated Money Services Businesses | Places select |
| | (MSBs)/Money Value Transfer Services (MVTSs)? | Please select |
| | | |
| 19 a1h | Does the Entity allow downstream relationships | The second s |
| | with MSBs, MVTSs, or Payment Service Provider | |
| | (PSPs)? | |
| 10 a 1h4 | MSBs | Otherse select |
| 19 a1h1 | | Please select |
| 19 a1h2 | MVTSs | Please select |
| 19 a1h3 | PSPs | Please select |
| | | |

| 19 a1i | Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs? | Please select |
|--------|---|---|
| 19 b | Cross-Border Bulk Cash Delivery | Please select |
| 19 c | Cross-Border Remittances | No |
| 19 d | Domestic Bulk Cash Delivery | Please select |
| 19 e | Hold Mail | No |
| 19 f | International Cash Letter | No |
| 19 g | Low Price Securities | Please select |
| 19 h | Payable Through Accounts | Please select |
| 191 | Payment services to non-bank entities who may | |
| | then offer third party payment services to their customers? | No |
| 19 i1 | If Y, please select all that apply below? | |
| 19 i2 | Third Party Payment Service Providers | Please select |
| 19 13 | Virtual Asset Service Providers (VASPs) | Please select |
| 19 i4 | eCommerce Platforms | Please select |
| 19 i5 | Other - Please explain | |
| 19 J | Private Banking | No |
| 19 k | Remote Deposit Capture (RDC) | Please select |
| 191 | Sponsoring Private ATMs | Please select |
| 19 m | Stored Value Instruments | No |
| 19 n | Trade Finance | Please select |
| 19 o | Virtual Assets | Please select |
| 19 р | For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence: | |
| 19 p1 | Check cashing service | No |
| 19 p1a | If yes, state the applicable level of due diligence | Please select |
| 19 p2 | Wire transfers | No |
| 19 p2a | If yes, state the applicable level of due diligence | Please select |
| 19 p3 | Foreign currency conversion | No |
| 19 p3a | If yes, state the applicable level of due diligence | Please select |
| 19 p4 | Sale of Monetary Instruments | No |
| 19 p4a | If yes, state the applicable level of due diligence | Please select |
| 19 p5 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. | |
| 19 q | Other high-risk products and services identified by the Entity (please specify) | |
| 20 | Confirm that all responses provided in the above Section are representative of all the LE's branches. | No |
| 20 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | Banco Bilbao Vizcaya Argentaria S.A., Niederlassung Deutschland |
| 21 | If appropriate, provide any additional information/context to the answers in this section. | |
| | TF & SANCTIONS PROGRAMME | |
| 22 | Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: | |
| 22 a | Appointed Officer with sufficient experience/expertise | Please select |
| 22 b | Adverse Information Screening | Please select |
| 22 c | Beneficial Ownership | Please select |
| 22 d | Cash Reporting | Please select |
| 22 e | CDD | Please select |
| 22 f | EDD | Please select |
| 22 g | Independent Testing | Please select |
| 22 h | Periodic Review | Please select |
| 221 | Policies and Procedures | Please select |
| 22 j | PEP Screening | Please select |
| 22 k | Risk Assessment | Please select |
| | | |
| 221 | Sanctions | Please select |

| 22 m | Suspicious Activity Reporting | Please select |
|--------|---|---|
| 22 n | Training and Education | Please select |
| 22 o | Transaction Monitoring | Please select |
| 23 | How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? | 1-10 |
| 24 | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29. | Please select |
| 25 | Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme? | Please select |
| 26 | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? | Please select |
| 26 a | If Y, provide further details | |
| 27 | Does the entity have a whistleblower policy? | Please select |
| 28 | Confirm that all responses provided in the above Section are representative of all the LE's branches | No |
| 28 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | Banco Bilbao Vizcaya Argentaria S.A., Niederlassung Deutschland |
| 29 | If appropriate, provide any additional information/context to the answers in this section. | |
| 4. ANT | BRIBERY & CORRUPTION | |
| 30 | Has the Entity documented policies and procedures | |
| | consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? | Please select |
| 31 | Does the Entity have an enterprise wide programme that sets minimum ABC standards? | Please select |
| 32 | Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? | Please select |
| 33 | Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? | Please select |
| 34 | Is the Entity's ABC programme applicable to: | Please select |
| 35 | Does the Entity have a global ABC policy that: | The second se |
| 35 a | Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage. | Please select |
| 35 b | Includes enhanced requirements regarding interaction with public officials? | Please select |
| 35 c | Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? | Please select |
| 36 | Does the Entity have controls in place to monitor the effectiveness of their ABC programme? | Please select |
| 37 | Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? | Please select |
| 38 | Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? | Please select |
| 38 a | If N, provide the date when the last ABC EWRA was completed. | |
| 39 | Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? | Please select |
| 40 | Does the Entity's ABC EWRA cover the inherent risk components detailed below: | Please select |
| 40 a | Potential liability created by intermediaries and other third-party providers as appropriate | Please select |

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

| 49 i | Define the process for escalating financial crime risk | |
|---|---|---|
| | issues/potentially suspicious activity identified by employees | Please select |
| 49 j | Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk | Please select |
| 49 k | Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates | Please select |
| 491 | Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship | Please select |
| 49 m | Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News | Please select |
| 49 n | Outline the processes for the maintenance of internal "watchlists" | Please select |
| 50 | Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business? | Please select |
| 51 | Does the Entity have record retention procedures that comply with applicable laws? | Please select |
| 51 a | If Y, what is the retention period? | Please select |
| 52 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 52 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 53 | If appropriate, provide any additional | |
| | information/context to the answers in this section. | |
| | | |
| | TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: | |
| 6. AML, C 54 54 a | TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client | Please select |
| 6. AML, C 54 54 a 54 b | TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product | Please select Please select |
| 6. AML, C 54 54 a 54 b 54 c | TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel | Please select Please select |
| 6. AML, C 54 54 a 54 b | TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the | Please select |
| 6. AML, C 54 54 a 54 b 54 c 54 d | TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography | Please select Please select |
| 6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a | TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below; | Please select Please select Please select |
| 6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 b 55 c | TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification | Please select Please select Please select Please select Please select |
| 6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d | TF & SANCTIONS RISK ASSESSMENT Does the Entify's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entify's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening | Please select Please select Please select Please select Please select Please select |
| 6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 c 55 c 55 c 55 c | TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News | Please select |
| 6. AML, C 54 54 a 54 b 54 c 54 c 54 d 55 55 a 55 a 55 c 55 c 55 c 55 c 55 c 5 | TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education | Please select |
| 6, AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c | TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance | Please select |
| 6. AML, C 54 54 a 54 b 54 c 55 d 55 a 55 a 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 h | TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education | Please select |
| 6. AML, C 54 54 a 54 b 54 c 54 d 55 | TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed | Please select |
| 6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 c 55 c 55 c 55 c 55 c 55 c 5 | TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF | Please select |
| 6. AML, C 54 54 a 54 b 54 c 55 d 55 a 55 b 55 c 55 d 55 c 55 f 55 f 55 f 55 f 56 a 56 a 57 | TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. | Please select |
| 6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c | TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: | Please select |
| 6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 c 55 c 55 c 55 c 55 c 5 | TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Trainsaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel | Please select |
| 6. AML, C 54 54 a 54 b 54 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h 56 a 56 a 57 a 57 a 57 c 57 d | TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography | Please select |
| 6. AML, C 54 54 a 54 b 54 c 55 d 55 a 55 b 55 c 55 d 55 c 55 f 55 f 55 f 56 a 57 a 57 a 57 c 57 d 58 | TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | Please select |
| 6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 c 55 d 55 c 55 d 55 c 55 f 55 c 55 f 55 f 55 f 56 56 57 a 57 a 57 c 57 a 57 c 58 a 58 a 58 a 59 a 57 a 57 a 58 a 58 a 58 a 59 a 59 a 59 a 57 a 57 a 58 a 58 a 58 a 58 a 58 a 58 a 58 a 58 a 59 | TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Cuistomer Due Diligence | Please select Please select |
| 6. AML, C 54 54 a 54 b 54 c 55 d 55 a 55 b 55 c 55 d 55 c 55 f 55 f 55 f 56 a 57 a 57 a 57 c 57 d 58 | TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | Please select |

| 58 e | Name Screening | Please select |
|-----------------|---|-----------------------------|
| 58 f | Transaction Screening | Please select |
| 58 g | Training and Education | Please select |
| 59 | Has the Entity's Sanctions EWRA been completed in the last 12 months? | Please select |
| 59 a | If N, provide the date when the last Sanctions EWRA was completed. | |
| 60 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 60 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 61 | If appropriate, provide any additional information/context to the answers in this section. | |
| 7. KYC. 0 | CDD and EDD | |
| 62 | Does the Entity verify the identity of the customer? | Please select |
| 63 | Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days? | Please select |
| 64 | Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: | |
| 64 a | Customer identification | Please select |
| 64 b | Expected activity | Please select |
| 64 c | Nature of business/employment | Please select |
| 64 d | Ownership structure | Please select |
| 64 e | Product usage | Please select |
| 64 f | Purpose and nature of relationship | Please select |
| 64 g | Source of funds | Please select |
| 64 h | Source of wealth | Please select |
| 65 | Are each of the following identified: | |
| 65 a | Ultimate beneficial ownership | Please select |
| 65 a1 | Are ultimate beneficial owners verified? | Please select |
| 65 b | Authorised signatories (where applicable) | Please select |
| 65 c | Key controllers | Yes |
| 65 d 66 | Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? | Please select Please select |
| 67 | Does the due diligence process result in customers receiving a risk classification? | Please select |
| 67 a | If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: | |
| 67 a1 | Product Usage | Please select |
| 67 a2 | Geography | Please select |
| 67 a3 | Business Type/Industry | Please select |
| 67 a4 | Legal Entity type | Please select |
| 67 a5 | Adverse Information | Please select |
| 67 a6 | Other (specify) | |
| 68 | For high risk non-individual customers, is a site visit a part of your KYC process? | Please select |
| 68 a | If Y, is this at: | |
| 68 a1 | Onboarding | Please select |
| 68 a2 | KYC renewal | Please select |
| 68 a3 68 a4 | Trigger event Other | Please select |
| 68 a4 68 a4a | If yes, please specify "Other" | Please select |
| 69 | Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? | Please select |
| 69 a | If Y, is this at: | |
| 69 a1 | Onboarding | Please select |
| 69 a2 | KYC renewal | Please select |

| 69 a3 | Trigger event | Plassa salast |
|--------------|---|---------------|
| 70 | What is the method used by the Entity to screen for | Please select |
| | Adverse Media/Negative News? | Please select |
| 71 | Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? | Please select |
| 71 a | If Y, is this at: | |
| 71 a1 | Onboarding | Please select |
| 71 a2 | KYC renewal | Please select |
| 71 a3 | Trigger event | Please select |
| 72 | What is the method used by the Entity to screen PEPs? | Please select |
| 73 | Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? | Please select |
| 74 | Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? | Please select |
| 74 a | If yes, select all that apply: | |
| 74 a1 | Less than one year | Please select |
| 74 a2 | 1 – 2 years | Please select |
| 74 a3 | 3 – 4 years | Please select |
| 74 a4 | 5 years or more | Please select |
| 74 a5 | Trigger-based or perpetual monitoring reviews | Please select |
| 74 a6 | Other (Please specify) | |
| 75 | Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews? | Please select |
| 76 | From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme? | |
| 76 a | Arms, defence, military | Please select |
| 76 b | Respondent Banks | Please select |
| 76 b1 | If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? | Please select |
| 76 c | Embassies/Consulates | Please select |
| 76 d | Extractive industries | Please select |
| 76 e | Gambling customers | Please select |
| 76 f | General Trading Companies | Please select |
| 76 g | Marijuana-related Entities | |
| 76 h | MSB/MVTS customers | Please select |
| 0.0194.098 | | Please select |
| 761 | Non-account customers | Please select |
| 76 j | Non-Government Organisations | Please select |
| 76 k | Non-resident customers | Please select |
| 76 I | Nuclear power | Please select |
| 76 m | Payment Service Providers | Please select |
| 76 n | PEPs | Please select |
| 76 o | PEP Close Associates | Please select |
| 76 p | PEP Related | Please select |
| 76 q | | Please select |
| 76 r | Red light businesses/Adult entertainment | Please select |
| 76 s | | |
| 76 t | | Please select |
| | - Control Par | Please select |
| 76 u | | Please select |
| 76 v | | Please select |
| 76 w | | Please select |
| 76 x 76 y | Virtual Asset Service Providers Other (specify) | Please select |
| 77 | If restricted, provide details of the restriction | |
| 78 | Does EDD require senior business management and/ or compliance approval? | Please select |

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

| 93 | Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: | |
|----------|--|---------------|
| 93 a | FATF Recommendation 16 | Please select |
| 93 b | Local Regulations | Please select |
| 93 b1 | If Y, specify the regulation | Predse select |
| 93 c | lf N, explain | |
| 94 | Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages? | Please select |
| 95 | Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages? | Please select |
| 95 a | If Y, does the Entity have procedures to include beneficiary address including country in cross border payments? | Please select |
| 96 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 96 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 97 | If appropriate, provide any additional information/context to the answers in this section. | |
| 10. SANC | TIONS | |
| 98 | Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? | Please select |
| 99 | Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)? | Please select |
| 100 | Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? | Please select |
| 101 | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? | Please select |
| 102 | What is the method used by the Entity for sanctions screening? | Please select |
| 102 a | If 'automated' or 'both automated and manual' selected: | |
| 102 a1 | Are internal system of vendor-sourced tools used? | Please select |
| 102 a1a | If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? | |
| 102 a2 | When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110) | Please select |
| 103 | Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? | Please select |
| 104 | What is the method used by the Entity? | Please select |

| 105 | Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening? | Please select |
|--|---|--|
| 106 | Select the Sanctions Lists used by the Entity in its sanctions screening processes: | |
| 106 a | Consolidated United Nations Security Council Sanctions List (UN) | Please select |
| 106 b | United States Department of the Treasury's Office of Foreign Assets Control (OFAC) | Please select |
| 106 c | Office of Financial Sanctions Implementation HMT (OFSI) | Please select |
| 106 d | European Union Consolidated List (EU) | Please select |
| 106 e | Lists maintained by other G7 member countries | Please select |
| 106 f | Other (specify) | |
| 107 | When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against: | |
| 107 a | Customer Data | Please select |
| 107 b | Transactions | Please select |
| 108 | Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions? | Νσ |
| 109 | Confirm that all responses provided in the above Section are representative of all the LE's branches | No |
| 109 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | Banco Bilbao Vizcaya Argentaria S.A., Niederlassung Deutschland |
| 110 | If appropriate, provide any additional information/context to the answers in this section. | |
| 11. TRAIN | ING & EDUCATION | |
| 111 | Does the Entity provide mandatory training, which includes: | |
| 111 a | Identification and reporting of transactions to | |
| | government authorities | Please select |
| 111 Б | government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered | Please select Please select |
| 111 b 111 с | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant | |
| | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, | Please select |
| 111 c | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant | Please select Please select |
| 111 c 111 d 111 e 111 f | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations | Please select Please select Please select |
| 111 c 111 d 111 e 111 f 112 | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: | Please select Please select Please select Please select |
| 111 c 111 d 111 e 111 f 112 112 a | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management | Please select |
| 111 c 111 d 111 e 111 f 112 112 a 112 b | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence | Please select |
| 111 c 111 d 111 e 111 f 112 112 a 112 b 112 c | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence | Please select |
| 111 c 111 d 111 e 111 f 112 112 a 112 b | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have | Please select Pl |
| 1111 c 1111 d 1111 f 1112 1112 a 1112 b 1112 c 1112 c 1112 d 1112 e | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced | Please select |
| 111 c 111 d 111 f 112 112 a 112 b 112 c 112 c | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1stLine of Defence 2nd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and | Please select Pl |
| 1111 c 1111 d 1111 f 1112 112 a 112 b 112 c 112 c 112 c 112 c 112 f | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1stLine of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training | Please select Pl |
| 1111 c 1111 d 1111 f 1112 a 1112 b 1112 c 1112 c 1112 c 1112 c 1112 f 1113 | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities? Does the Entity provide customised training for AML, | Please select |

| 115 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
|-----------------------|--|---|
| 116 | If appropriate, provide any additional information/context to the answers in this section. | In addition to BBVA Group trainings, Banco Bilbao Vizcaya Argentaria S.A., Niederlassung Deutschland provides regular onsite training to its staff in Germany. |
| | | |
| and the second second | TY ASSURANCE /COMPLIANCE TESTING | |
| 117 | Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)? | Please select |
| 118 | Does the Entity have a program wide risk based Compliance Testing process (separate from the Independent Audit function)? | Please select |
| 119 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 119 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 120 | If appropriate, provide any additional information/context to the answers in this section. | |
| 13. AUDIT | | |
| 121 | In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? | Please select |
| 122 | How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: | |
| 122 a | Internal Audit Department | Please select |
| 122 b | External Third Party | Please select |
| 123 | Does the internal audit function or other independent third party cover the following areas: | |
| 123 a | AML, CTF, ABC, Fraud and Sanctions policy and procedures | Please select |
| 123 b | Enterprise Wide Risk Assessment | Please select |
| 123 c 123 d | Governance | Please select |
| 123 d | KYC/CDD/EDD and underlying methodologies Name Screening & List Management | Please select |
| 123 f | Reporting/Metrics & Management Information | Please select Please select |
| 123 g | Suspicious Activity Filing | Please select |
| 123 h | Technology | Please select |
| 123 i | Transaction Monitoring | Please select |
| 123 j | Transaction Screening including for sanctions | Please select |
| 123 k | Training & Education | Please select |
| 123 | Other (specify) | |
| 124 | Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? | Please select |
| 125 | Confirm that all responses provided in the above section are representative of all the LE's branches | Please select |
| 125 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 126 | If appropriate, provide any additional information/context to the answers in this section. | |
| 4. FRAU | | |
| 127 | Does the Entity have policies in place addressing fraud risk? | Please select |
| 128 | Does the Entity have a dedicated team responsible for preventing & detecting fraud? | Please select |

| 129 | Does the Entity have real time monitoring to detect fraud? | Please select |
|---|---|--|
| 130 | Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID? | Please select |
| 131 | Confirm that all responses provided in the above section are representative of all the LE's branches | Please select |
| 131 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 132 | If appropriate, provide any additional information/context to the answers in this section. | c 0 |
| Anti- Money <u>BBVA S.A.,</u> every effort t The Financia legal and reg The Financia standards. The Financia The Financia | Laundering, Chief Compliance Officer, Global Head of Financial Niederlassung Deutschland(Financial Instituti o remain in full compliance with all applicable financial crime laws Il Institution understands the critical importance of having effectiv ulatory obligations. I Institution recognises the importance of transparency regardin | on name) is fully committed to the fight against financial crime and makes s, regulations and standards in all of the jurisdictions in which it does business and holds accounts. we and sustainable controls to combat financial crime in order to protect its reputation and to meet its g parties to transactions in international payments and has adopted/is committed to adopting these y with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. ill be updated no less frequently than every eighteen months. |
| | in institution commits to me accurate supplemental information on | a lunialy basis. |
| Institution. I, <u>Marek Ki</u> | provided in this Wolfsberg CBDDQ are complete and correct to lian, Head of Compliance & AML Germany (MLRO or equi | f Correspondent Banking or equivalent), certify that I have read and understood this declaration, that my honest belief, and that I am authorised to execute this declaration on behalf of the Financial valent), certify that I have read and understood this declaration, that the answers provided in this m authorised to execute this declaration on behalf of the Financial Institution. |
| ancolei Niec | (Signature & Date (Signature & | ») 2-5 |

the Wolfsberg Group

Financial Institution Name: Location (Country) :

| | No# | Question | Answer |
|-----|--------|--|--------|
| 1. | ENTITY | & OWNERSHIP | |
| 1 | | Full Legal Name | |
| 1 | | Tuli Legar Name | |
| | | | |
| | | | |
| | | | |
| 2 | | Append a list of foreign branches which are covered | |
| | | by this questionnaire | |
| | | | |
| | | | |
| | | | |
| 3 | | Full Legal (Registered) Address | |
| | | | |
| | | | |
| | | | |
| _ | | | |
| 4 | | Full Primary Business Address (if different from | |
| | | above) | |
| | | | |
| | | | |
| 5 | | Date of Entity incorporation/establishment | |
| 5 | | Bate of Entry moorporation/establishinent | |
| | | | |
| | | | |
| | | | |
| 6 | | Select type of ownership and append an ownership | |
| | | chart if available | |
| 6 8 | 9 | Publicly Traded (25% of shares publicly traded) | |
| | | If Y, indicate the exchange traded on and ticker | |
| 6 | a I | | |
| | | symbol | |
| | | | |
| | | | |
| 6 | h | Member Owned/Mutual | |
| 6 | | Government or State Owned by 25% or more | |
| 6 | | Privately Owned | |
| | | | |
| 6 | a1 | If Y, provide details of shareholders or ultimate | |
| | | beneficial owners with a holding of 10% or more | |
| | | | |
| | | | |
| 7 | | % of the Entity's total shares composed of bearer | |
| - | | shares | |
| | | 310103 | |
| | | | |
| | | | |
| 8 | | Does the Entity, or any of its branches, operate under | |
| | | an Offshore Banking License (OBL)? | |
| 8 ; | 9 | If Y, provide the name of the relevant branch/es | |
| - | - | which operate under an OBL | |
| | | | |
| | | | |
| | | | |
| 9 | | Does the Bank have a Virtual Bank License or | |
| | | provide services only through online channels? | |
| 10 |) | Name of primary financial regulator/supervisory | |
| | | authority | |
| | | | |
| | | | |
| | | | |
| 11 | | Provide Legal Entity Identifier (LEI) if available | |
| | | | |
| | | | |
| | | | |
| 4.5 | | | |
| 12 | | Provide the full legal name of the ultimate parent (if | |
| | | different from the Entity completing the DDQ) | |
| | | | |
| | | | |
| | | | |

| 40 | Installed a construction of the second second second states of | |
|-----------|--|--|
| 13 | Jurisdiction of licensing authority and regulator of | |
| | ultimate parent | |
| | | |
| | | |
| | | |
| | | |
| 14 | Select the business areas applicable to the Entity | |
| 14 a | Retail Banking | |
| 14 b | Private Banking | |
| | | |
| 14 c | Commercial Banking | |
| 14 d | Transactional Banking | |
| | <u> </u> | |
| 14 e | Investment Banking | |
| 14 f | Financial Markets Trading | |
| | , and the second s | |
| 14 g | Securities Services/Custody | |
| 14 h | Broker/Dealer | |
| 14 i | Multilateral Development Bank | |
| | • | |
| 14 j | Wealth Management | |
| 14 k | Other (please explain) | |
| 14 K | | |
| | | |
| | | |
| | | |
| | | |
| 15 | Does the Entity have a significant (10% or more) | |
| 15 | | |
| | portfolio of non-resident customers or does it derive | |
| | more than 10% of its revenue from non-resident | |
| 1 | customers? (Non-resident means customers primarily | |
| 1 | | |
| | resident in a different jurisdiction to the location | |
| 1 | where bank services are provided) | |
| 1 | . , | |
| 15 a | If Y, provide the top five countries where the non- | |
| 15 4 | | |
| | resident customers are located. | |
| | | |
| | | |
| | | |
| 16 | Select the closest value: | |
| | | |
| 16 a | Number of employees | |
| 16 b | Total Assets | |
| | | |
| 17 | Confirm that all responses provided in the above | |
| | Section are representative of all the LE's branches. | |
| 17 a | If N algorify which guagations the difference (a relate to | |
| 17 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to. | |
| | | |
| | | |
| | | |
| 10 | | |
| 18 | If appropriate, provide any additional | |
| | information/context to the answers in this section. | |
| | | |
| | | |
| | | |
| | | |
| 2. PRODUC | CTS & SERVICES | |
| 19 | Does the Entity offer the following products and | |
| | services: | |
| | | |
| 19 a | Correspondent Banking | |
| 19 a1 | IfY | |
| | | |
| 19 a1a | Does the Entity offer Correspondent Banking | |
| | services to domestic banks? | |
| | | |
| 19 a1b | Does the Entity allow domestic bank clients to | |
| 1 | provide downstream relationships? | |
| 40.4 | | |
| 19 a1c | Does the Entity have processes and procedures | |
| | in place to identify downstream relationships with | |
| | domestic banks? | |
| | | |
| 19 a1d | Does the Entity offer Correspondent Banking | |
| | services to foreign banks? | |
| L | Ĵ | |
| 19 a1e | Does the Entity allow downstream relationships | |
| | with foreign banks? | |
| | <u> </u> | |
| 19 a1f | Does the Entity have processes and procedures | |
| | in place to identify downstream relationships with | |
| | | |
| | foreign banks? | |
| 19 a1g | Does the Entity offer Correspondent Banking | |
| Jany | | |
| 1 | services to regulated Money Services Businesses | |
| 1 | (MSBs)/Money Value Transfer Services (MVTSs)? | |
| 10 - 11 | | |
| 19 a1h | Does the Entity allow downstream relationships | |
| | with MSBs, MVTSs, or Payment Service Provider | |
| | (PSPs)? | |
| L | | |
| 19 a1h1 | MSBs | |
| 19 a1h2 | | |
| | MVTSs | |
| 19 a1h3 | PSPs | |

| 19 a1i | Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs? | |
|--|---|--|
| 19 b | Cross-Border Bulk Cash Delivery | |
| 19 c | Cross-Border Remittances | |
| 19 c 19 d | Domestic Bulk Cash Delivery | |
| | | |
| 19 e | Hold Mail | |
| 19 f | International Cash Letter | |
| 19 g | Low Price Securities | |
| 19 h | Payable Through Accounts | |
| 19 i | Payment services to non-bank entities who may | |
| 101 | then offer third party payment services to their customers? | |
| 19 i1 | If Y, please select all that apply below? | |
| 19 i2 | Third Party Payment Service Providers | |
| 19 i3 | Virtual Asset Service Providers (VASPs) | |
| 19 i4 | eCommerce Platforms | |
| - | | |
| 19 i5 | Other - Please explain | |
| 19 j | Private Banking | |
| 19 k | Remote Deposit Capture (RDC) | |
| 19 I | Sponsoring Private ATMs | |
| 19 m | Stored Value Instruments | |
| 19 m | Trade Finance | |
| 19 0 | Virtual Assets | |
| | | |
| 19 p | For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence: | |
| 19 p1 | Check cashing service | |
| 19 p1a | If yes, state the applicable level of due diligence | |
| 19 p2 | Wire transfers | |
| 19 p2a | If yes, state the applicable level of due diligence | |
| 19 p2a 19 p3 | | |
| | Foreign currency conversion | |
| 19 p3a | If yes, state the applicable level of due diligence | |
| 19 p4 | Sale of Monetary Instruments | |
| 19 p4a | If yes, state the applicable level of due diligence | |
| | | |
| 19 p5 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. | |
| | If you offer other services to walk-in customers please provide more detail here, including | |
| 19 p5 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by | |
| 19 p5 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above | |
| 19 p5 19 q 20 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to | |
| 19 p5 19 q 20 20 a 21 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. | |
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| 19 p5 19 q 20 20 a 21 3. AML, C1 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum | |
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| 19 p5 19 q 20 20 a 21 3. AML, C1 22 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise | |
| 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 b | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening | |
| 19 p5 19 p5 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership | |
| 19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 c 22 d | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting | |
| 19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 c 22 c 22 c 22 c | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD | |
| 19 p5 19 q 20 20 a 21 3. AML, C1 22 a 22 a 22 b 22 c 22 c 22 c 22 c 22 c 22 c 22 c | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting | |
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| 19 p5 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 z 22 z 22 z 22 d 22 c 22 d 22 c 22 d 22 c 22 d 22 c 22 d 22 c | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review | |
| 19 p5 19 p5 19 q 20 20 a 21 22 a 22 a 22 a 22 c 22 c | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures | |
| 19 p5 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c 22 d 22 c 22 c 22 f 22 g 22 f 22 g 22 h 22 j | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening | |
| 19 p5 19 p5 19 q 20 a 20 a 21 a 22 a 22 a 22 b 22 c 22 d 22 c 22 d 22 c 22 d 22 g 22 h 22 i 22 j 22 k | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment | |
| 19 p5 19 p5 19 q 20 20 a 20 a 21 22 a 22 a 22 b 22 c 22 c 22 d 22 c 22 c 22 f 22 g 22 h 22 j 22 j | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening | |

| 22 m | Suspicious Activity Reporting | |
|-----------|---|--|
| 22 n | Training and Education | |
| 22 o | Transaction Monitoring | |
| 23 | How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? | |
| 24 | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29. | |
| 25 | Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme? | |
| 26 | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? | |
| 26 a | If Y, provide further details | |
| 27 | Does the entity have a whistleblower policy? | |
| 28 | Confirm that all responses provided in the above Section are representative of all the LE's branches | |
| 28 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 29 | If appropriate, provide any additional information/context to the answers in this section. | |
| 4. ANTI E | RIBERY & CORRUPTION | |
| 30 | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? | |
| 31 | Does the Entity have an enterprise wide programme that sets minimum ABC standards? | |
| 32 | Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? | |
| 33 | Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? | |
| 34 | Is the Entity's ABC programme applicable to: | |
| 35 | Does the Entity have a global ABC policy that: | |
| 35 a | Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage. | |
| 35 b | Includes enhanced requirements regarding interaction with public officials? | |
| 35 c | Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? | |
| 36 | Does the Entity have controls in place to monitor the effectiveness of their ABC programme? | |
| 37 | Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? | |
| 38 | Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? | |
| 38 a | If N, provide the date when the last ABC EWRA was completed. | |
| 39 | Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? | |
| 40 | Does the Entity's ABC EWRA cover the inherent risk components detailed below: | |
| 40 a | Potential liability created by intermediaries and other third-party providers as appropriate | |

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

| 49 i | Define the process for escalating financial crime risk issues/potentially suspicious activity identified by | |
|--|---|--|
| | employees | |
| 49 j | Define the process, where appropriate, for | |
| - | terminating existing customer relationships due to financial crime risk | |
| 49 k | Define the process for exiting clients for financial | |
| | crime reasons that applies across the entity, including foreign branches and affiliates | |
| 49 I | Define the process and controls to identify and | |
| | handle customers that were previously exited for | |
| | financial crime reasons if they seek to re-establish a relationship | |
| 49 m | Outline the processes regarding screening for | |
| | sanctions, PEPs and Adverse Media/Negative News | |
| 49 n | Outline the processes for the maintenance of internal "watchlists" | |
| 50 | Has the Entity defined a risk tolerance statement or | |
| | similar document which defines a risk boundary around their business? | |
| 51 | Does the Entity have record retention procedures that | |
| • | comply with applicable laws? | |
| 51 a | If Y, what is the retention period? | |
| | | |
| | | |
| 52 | Confirm that all means any ideal in the above | |
| 32 | Confirm that all responses provided in the above Section are representative of all the LE's branches | |
| 52 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to. | |
| | | |
| | | |
| 53 | If appropriate, provide any additional information/context to the answers in this section. | |
| | | |
| | | |
| | | |
| 6. AML. CTF | & SANCTIONS RISK ASSESSMENT | |
| 6. AML, CTF 54 | & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the | |
| 54 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: | |
| 54 54 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client | |
| 54 54 a 54 b | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product | |
| 54 a 54 b 54 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel | |
| 54 a 54 b 54 c 54 d | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography | |
| 54 a 54 b 54 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel | |
| 54 a 54 b 54 c 54 d 55 55 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring | |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 b | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence | |
| 54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification | |
| 54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c 55 c 55 d | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening | |
| 54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification | |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education | |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance | |
| 54 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information | |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance | |
| 54 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 d 55 d 55 d 55 d 55 d 55 f 55 g 55 h 56 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? | |
| 54 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed | |
| 54 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 d 55 d 55 d 55 d 55 d 55 f 55 g 55 h 56 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF | |
| 54 54 a 54 b 54 c 55 a 55 a 55 b 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the Iast 12 months? If N, provide the date when the Iast AML & CTF EWRA was completed. | |
| 54 54 a 54 b 54 c 55 a 55 a 55 b 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent | |
| 54 54 a 54 b 54 c 54 d 55 a 55 a 55 c 55 c 55 d 55 c 55 d 55 c 55 f 55 f 55 h 56 a 57 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: | |
| 54 54 a 54 b 54 c 54 d 55 a 55 a 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client | |
| 54 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 c 57 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product | |
| 54 54 a 54 b 54 c 54 d 55 a 55 a 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel | |
| 54 54 a 54 b 54 c 54 d 55 a 55 a 55 a 55 c 55 c 57 c 57 c 57 c 57 c 57 c 57 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product | |
| 54 54 a 54 b 54 c 54 d 55 55 b 55 c 55 d 55 c 55 d 55 d 55 d 55 f 55 g 55 f 55 f 56 57 57 a 57 b 57 c 57 d 58 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | |
| 54 54 a 54 b 54 c 55 a 55 b 55 b 55 c 55 c 55 d 55 c 55 d 55 f 55 f 55 h 56 57 57 a 57 d 57 d 58 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | |
| 54 54 a 54 b 54 c 55 a 55 b 55 c 55 c 55 d 55 c 55 d 55 f 55 g 55 h 56 a 57 c 57 d 58 a 58 b | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance | |
| 54 54 a 54 b 54 d 55 a 55 b 55 c 55 d 55 c 55 d 55 f 55 f 55 h 56 57 57 a 57 d 57 d 58 58 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | |

| 58 e | Name Careening | |
|----------------|---|--|
| 58 f | Name Screening | |
| 58 f 58 g | Transaction Screening Training and Education | |
| 58 g 59 | Has the Entity's Sanctions EWRA been completed in the last 12 months? | |
| 50 - | | |
| 59 a | If N, provide the date when the last Sanctions EWRA was completed. | |
| 60 | Confirm that all responses provided in the above Section are representative of all the LE's branches | |
| 60 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to. | |
| 61 | If appropriate, provide any additional information/context to the answers in this section. | |
| 7. KYC, C | DD and EDD | |
| 62 | Does the Entity verify the identity of the customer? | |
| 63 | Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days? | |
| 64 | Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: | |
| 64 a | Customer identification | |
| 64 b | Expected activity | |
| 64 c | Nature of business/employment | |
| 64 d | Ownership structure | |
| 64 e | Product usage | |
| 64 f | Purpose and nature of relationship Source of funds | |
| 64 g 64 h | Source of runds Source of wealth | |
| 65 | Are each of the following identified: | |
| 65 a | Ultimate beneficial ownership | |
| 65 a1 | Are ultimate beneficial owners verified? | |
| 65 b | Authorised signatories (where applicable) | |
| 65 c | Key controllers | |
| 65 d | Other relevant parties | |
| 66 | What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? | |
| 67 | Does the due diligence process result in customers receiving a risk classification? | |
| 67 a | If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: | |
| 67 a1 | Product Usage | |
| 67 a2 67 a3 | Geography | |
| 67 a3 67 a4 | Business Type/Industry Legal Entity type | |
| 67 a4 | Adverse Information | |
| 67 a6 | Other (specify) | |
| 68 | For high risk non-individual customers, is a site visit a part of your KYC process? | |
| 68 a | If Y, is this at: | |
| 68 a1 | Onboarding | |
| 68 a2 | KYC renewal | |
| 68 a3 68 a4 | Trigger event Other | |
| 68 a4a | If yes, please specify "Other" | |
| 69 | Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? | |
| 69 a | If Y, is this at: | |
| 69 a1 | Onboarding | |
| 69 a2 | KYC renewal | |

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

| 78 a | If Y indicate who provides the approval: | |
|-----------|---|--|
| 79 | Does the Entity have specific procedures for | |
| | onboarding entities that handle client money such as | |
| | lawyers, accountants, consultants, real estate agents? | |
| 80 | Does the Entity perform an additional control or quality review on clients subject to EDD? | |
| 81 | Confirm that all responses provided in the above Section are representative of all the LE's branches | |
| 81 a | If N, clarify which questions the difference/s relate to | |
| 01 a | and the branch/es that this applies to | |
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| 0.0 | | |
| 82 | If appropriate, provide any additional information/context to the answers in this section. | |
| | | |
| | | |
| | | |
| 8. MONITO | DRING & REPORTING | |
| 83 | Does the Entity have risk based policies, procedures | |
| | and monitoring processes for the identification and | |
| | reporting of suspicious activity? | |
| 04 | What is the method used by the Entity to monitor | |
| 84 | transactions for suspicious activities? | |
| <u> </u> | | |
| 84 a | If manual or combination selected, specify what | |
| | type of transactions are monitored manually | |
| | | |
| | | |
| 84 b | If automated or combination selected, are internal system or vendor-sourced tools used? | |
| | | |
| 84 b1 | If 'Vendor-sourced tool' or 'Both' selected, what is | |
| | the name of the vendor/tool? | |
| | | |
| | | |
| 84 b2 | When was the tool last updated? | |
| 04 62 | When was the outemated Transaction Manitaring | |
| 84 b3 | When was the automated Transaction Monitoring application last calibrated? | |
| | | |
| 85 | Does the Entity have regulatory requirements to | |
| | report suspicious transactions? | |
| 85 a | If Y, does the Entity have policies, procedures and | |
| 05 a | processes to comply with suspicious transaction | |
| | reporting requirements? | |
| - | | |
| 86 | Does the Entity have policies, procedures and | |
| | processes to review and escalate matters arising from | |
| | the monitoring of customer transactions and activity? | |
| 87 | Does the Entity have a data quality management | |
| -· | programme to ensure that complete data for all | |
| | transactions are subject to monitoring? | |
| | Deep the Entity have processes in place to reason it | |
| 88 | Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities | |
| | in a timely manner? | |
| | | |
| 89 | Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in | |
| | a timely manner? | |
| 90 | Confirm that all responses provided in the above | |
| | Section are representative of all the LE's branches | |
| 90 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to | |
| | | |
| | | |
| 91 | If appropriate, provide any additional | |
| | information/context to the answers in this section. | |
| | | |
| | | |
| 9. PAYME | NT TRANSPARENCY | |
| 92 | Does the Entity adhere to the Wolfsberg Group | |
| 1 | Payment Transparency Standards? | |

| 93 | Does the Entity have policies, procedures and | |
|----------|--|--|
| 55 | | |
| | processes to comply with and have controls in place | |
| | to ensure compliance with: | |
| 93 a | FATF Recommendation 16 | |
| 93 b | Local Regulations | |
| 93 b1 | If Y, specify the regulation | |
| 55 51 | | |
| 93 c | If N, explain | |
| | | |
| 94 | Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages? | |
| 95 | Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages? | |
| 95 a | If Y, does the Entity have procedures to include beneficiary address including country in cross border payments? | |
| 96 | Confirm that all responses provided in the above Section are representative of all the LE's branches | |
| 96 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 97 | If appropriate, provide any additional information/context to the answers in this section. | |
| 10. SANC | TIONS | |
| 98 | Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? | |
| 99 | Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)? | |
| 100 | Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? | |
| 101 | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? | |
| 102 | What is the method used by the Entity for sanctions screening? | |
| 102 a | If 'automated' or 'both automated and manual' selected: | |
| 102 a1 | Are internal system of vendor-sourced tools used? | |
| 102 a1a | If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? | |
| 102 a2 | When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110) | |
| 103 | Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? | |
| 104 | What is the method used by the Entity? | |

| | - | |
|-------|--|--|
| 105 | Does the Entity have a data quality management | |
| | programme to ensure that complete data for all | |
| | transactions are subject to sanctions screening? | |
| | | |
| 106 | Select the Sanctions Lists used by the Entity in its | |
| | sanctions screening processes: | |
| 106 a | Consolidated United Nations Security Council | |
| 100 u | Sanctions List (UN) | |
| | | |
| 106 b | United States Department of the Treasury's Office of | |
| | Foreign Assets Control (OFAC) | |
| 106 c | Office of Financial Sanctions Implementation HMT | |
| | (OFSI) | |
| | | |
| 106 d | European Union Consolidated List (EU) | |
| 106 e | Lists maintained by other G7 member countries | |
| 106 f | Other (specify) | |
| | (| |
| | | |
| | | |
| | | |
| 107 | When regulatory authorities make updates to their | |
| 101 | Sanctions list, how many business days before the | |
| | | |
| | entity updates their active manual and/or automated | |
| | screening systems against: | |
| 107 a | Customer Data | |
| 107 b | Transactions | |
| 107 5 | | |
| 100 | Does the Entity have a physical presence, e.g. | |
| | branches, subsidiaries, or representative offices | |
| | located in countries/regions against which UN, OFAC, | |
| | OFSI, EU or G7 member countries have enacted | |
| | comprehensive jurisdiction-based Sanctions? | |
| 109 | Confirm that all responses provided in the above | |
| 100 | Section are representative of all the LE's branches | |
| 100 | | |
| 109 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to. | |
| | | |
| | | |
| 110 | lf an ann aicte ann aide ann additional | |
| 110 | If appropriate, provide any additional | |
| | information/context to the answers in this section. | |
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| | | |
| | G & EDUCATION | |
| 111 | Does the Entity provide mandatory training, which | |
| | includes: | |
| 111 a | Identification and reporting of transactions to | |
| | government authorities | |
| 111 b | Examples of different forms of money laundering, | |
| | terrorist financing and sanctions violations relevant | |
| | for the types of products and services offered | |
| | for the types of products and services offered | |
| | | |
| 111 c | Internal policies for controlling money laundering, | |
| | terrorist financing and sanctions violations | |
| 111 d | New issues that occur in the market, e.g. significant | |
| | regulatory actions or new regulations | |
| | | |
| 111 e | Conduct and Culture | |
| 111 f | Fraud | |
| 112 | Is the above mandatory training provided to: | |
| 112 a | Board and Senior Committee Management | |
| 112 b | 1st Line of Defence | |
| | 2nd Line of Defence | |
| 112 c | | |
| 112 d | 3rd Line of Defence | |
| 112 e | Third parties to which specific FCC activities have | |
| | been outsourced | |
| 112 f | Non-employed workers (contractors/consultants) | |
| 1121 | | |
| 113 | Does the Entity provide AML, CTF & Sanctions training | |
| | that is targeted to specific roles, responsibilities and | |
| | high-risk products, services and activities? | |
| 114 | Does the Entity provide customised training for AML, | |
| | CTF and Sanctions staff? | |
| 114 a | If Y, how frequently is training delivered? | |
| 115 | Confirm that all responses provided in the above | |
| | Section are representative of all the LE's branches | |
| | | |

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

| 129 | Does the Entity have real time monitoring to detect fraud? | | | |
|-----------------------------|---|--|--|--|
| 130 | Do the Entity's processes include gathering additional information to support its fraud controls, for | | | |
| | example: IP address, GPS location, and/or device ID? | | | |
| 131 | Confirm that all responses provided in the above section are representative of all the LE's branches | | | |
| 131 a | If N, clarify which questions the difference/s relate to | | | |
| | and the branch/es that this applies to. | | | |
| | | | | |
| 132 | If appropriate, provide any additional | | | |
| | information/context to the answers in this section. | | | |
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| Declarati | ion Statement | | | |
| Wolfsberg G | roup Correspondent Banking Due Diligence Questionnaire 2023 (CE | | | |
| Declaration | Statement (To be signed by Global Head of Correspondent Bank | king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of | | |
| Anti- Money | Laundering, Chief Compliance Officer, Global Head of Financial | Crimes Compliance OR equivalent) | | |
| | (Financial Institut | ion name) is fully committed to the fight against financial arises and makes | | |
| every effort | (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts. | | | |
| | The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations. | | | |
| The Financi standards. | The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these | | | |
| | The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months. | | | |
| The Financi | al Institution commits to file accurate supplemental information or | n a timely basis. | | |
| | | | | |
| I, | | of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that | | |
| the answers Institution. | provided in this Wolfsberg CBDDQ are complete and correct to | my honest belief, and that I am authorised to execute this declaration on behalf of the Financial | | |
| | | | | |
| I, Wolfsberg C | | ivalent), certify that I have read and understood this declaration, that the answers provided in this am authorised to execute this declaration on behalf of the Financial Institution. | | |
| | | | | |
| | (Signature & Dat | e) | | |
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| | (Signature & Dat | e) | | |
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Assinado por: Jorge Manuel Canha Carvalho Luís Identificação: BIO7440544 Data: 2023-11-27 às 15:46:44 Local: LBEON Motivo: WOLFSBERG QUESTIONNAIRE BBVA PORTUGAL

the Wolfsberg Group

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

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Mead Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base atc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

| No# | Question | Answer |
|-----------|---|---|
| 1. ENTITY | & OWNERSHIP | |
| 1 | Full Legal Name | Banco Bilban Vizcaya Argentaria, S.A. Shanghai Branch |
| 2 | Append a list of foreign branches which are covered by this questionneire | BBVA Shanghei Brench |
| З | Full Legal (Registered) Address | 4501,08 Jin Mao Tower,88 Century Boulevard, Shanghai 200121, China |
| 4 | Full Primary Business Address (if different from above) | |
| 5 | Date of Entity incorporation/establishment | 16 Nov,2015 |
| 6 | Select type of ownership and append an ownership chart if available | |
| 6 a | Publicly Traded (25% of shares publicly traded) | Please select |
| 6 a1 | If Y, indicate the exchange traded on and licker symbol | |
| 16 b | Member Owned/Mutual | Please select |
| 6 c | Government or State Owned by 25% or more | Please select |
| 6 d | Privately Owned | Please select |
| 6 d1 | If Y, provide details of shareholders or utimate beneficial owners with a holding of 10% or more | |
| 7 | % of the Entity's total shares composed of bearer shares | |
| 8 | Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)? | Please select |
| 8 a | If Y, provide the name of the relevant branch/es which operate under an OBL | |
| 9 | Doos the Bank have a Virtual Bank License or provide services only through online channels? | Please select |
| 10 | Name of primary financial regulator/supervisory authority | National Administration of Financial Regulation People's Bank of China |
| 11 | Provide Legal Entity Identifier (LEI) if available | 300300C1321131000022 |
| 12 | Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ) | |

| Idmate parent Idmate parent 14 Stlect the business areas applicable to the Entry 74 Robit Banking 14 Product Stream (Entry) 14 Commercial Stream (Entry) 14 Commercial Stream (Entry) 14 Product Stream (Entry) 14 Product Stream (Entry) 14 Stream (Entry) 15 Does the Entry have applicant (ON or more) 16 Other (Please applicant (ON or more) 17 Does the Entry have applicant (ON or more) 18 Other (Please applicant (ON or more) 19 Does the Entry have applicant (ON or more) 19 Does the Entry have a stepficant (ON or more) 19 Stream (Stream (Entry) have a stepficant (ON or more) 19 Stream (Stream | | | |
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| 19 a11 Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs? Please select 19 b Cross-Border Bulk Cash Delivery Please select 19 c Cross-Border Remittences Please select 19 d Domestic Bulk Cash Delivery Please select 19 d International Cash Letter No 19 f International Cash Letter No 19 g Low Price Securities Please select 19 h Payable Through Accounts Please select 19 i Payment services to non-bank entities who may then offer third party payment services to their customers? No 19 i1 If Y, please select all that apply below? No 19 i2 Third Party Payment Service Providers Please select 19 i3 Virtual Asset Service Providers (VASPs) Please select <th></th> | |
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| 19 i5 Other - Please explain | |
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| | |
| 19 j Private Banking No | |
| 19 k Remote Deposit Capture (RDC) Please select | |
| 191 Sponsoring Private ATMs Please select | |
| 19 m Stored Value Instruments No | |
| 19 n Trade Finance Please select | |
| 19 o Virtual Assets Please select | |
| 19 p For each of the following please stale whether you offer the service to walk-in customers and if so, the applicable level of due diligence: | |
| | |
| 19 p1 Check cashing service No 19 p1a If yes, state the applicable level of due diligence Please select | |
| 19 p2 Wire transfers Please select | |
| 19 p2a If yes, state the applicable level of due diligence Please select | · · · · · · · · · · · · · · · · |
| 19 p3 Foreign currency conversion Please select | |
| 19 p3a If yes, state the applicable level of due diligence Please select | |
| 19 p4 Sale of Monetary Instruments Please select | |
| 19 p4a If yes, state the applicable level of due diligence Please select | |
| 19 p5 If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. | |
| 19 q Other high-risk products and services identified by the Entity (please specify) | |
| 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. Please select | |
| 20 a If N. clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| | |
| | |
| 21 If appropriate, provide any additional information/context to the answers in this section. | |
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| information/context to the answers in this section. 3. AML, CTF & SANCTIONS PROGRAMME | |
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| 22 m | Suspicious Activity Reporting | Please select |
|---------|---|---------------|
| 22 n | Training and Education | Please select |
| 22.0 | Transaction Monitoring | Please select |
| 23 | How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? | 1-10 |
| 24 | Is the Enlity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29. | Yes |
| 25 | Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme? | Please select |
| 26 | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? | Piesse select |
| 26 a | If Y, provide further details | |
| 27 | Does the entity have a whistleblower policy? | Please select |
| 28 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 28 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 29 | If appropriate, provide any additional information/context to the answers in this section. | |
| 4. ANTI | BRIBERY & CORRUPTION | l |
| 30 | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? | Please select |
| 31 | Does the Entity have an enterprise wide programme that sets minimum ABC standards? | Please select |
| 32 | Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? | Please select |
| 33 | Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? | Please select |
| 34 | is the Entity's ABC programme applicable to: | Please select |
| 35 | Does the Entity have a global ABC policy that: | |
| 35 a | Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage. | Please select |
| 35 Ь | Includes enhanced requirements regarding interaction with public officials? | Plezse select |
| 35 c | Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? | Plazse selact |
| 36 | Does the Entity have controls in place to monitor the effectiveness of their ABC programme? | Please select |
| 37 | Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? | Please select |
| 38 | Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? | Please select |
| 38 a | If N, provide the dale when the last ABC EWRA was completed. | |
| 39 | Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? | Please select |
| 40 | Does the Entity's ABC EWRA covor the inherent risk components detailed below; | Please select |
| 40 a | Potential liability created by intermediaries and other third-party providers as appropriate | Please select |
| - | | |

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

| 49 i | Define the process for escalating financial crime risk Issues/potentially suspicious activity identified by employees | Pléáse select |
|--------------|---|-----------------------------|
| 49 j | Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk | Please select |
| 49 k | Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates | Please select |
| 491 | Define the process and controls to Identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship | Please select |
| 49 m | Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News | Please seject |
| 49 n | Outline the processes for the maintenance of internal "watchlists" | Please select |
| 50 | Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business? | Please select |
| 51 | Does the Entity have record retention procedures that comply with applicable laws? | Please select |
| 51 a | If Y, what is the retention period? | Please select |
| 52 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 52 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 53 | If appropriate, provide any additional Information/context to the answers in this section. | |
| A AMI CT | F& SANCTIONS RISK ASSESSMENT | |
| 54 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: | |
| 54 a | Client | Please select |
| 54 b | Product | Please select |
| 54 c | Channel | Please select |
| 54 d | Geography | Please select |
| 55 | Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: | |
| 55 a | Transaction Monitoring | Please select |
| 55 b | Customer Due Diligence | Please select |
| 55 c | PEP Identification | Picase seleri |
| 55 d | Transaction Screening | Please select |
| 55 e | Name Screening against Adverse Media/Negative News | Please select |
| 55 f | Training and Education | Please select |
| 55 g | Governance | Please select |
| 55 h 56 | Management Information I las the Entity's AML & CTF EWRA been completed | Please select |
| 56 a | in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. | |
| 57 | Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: | |
| 57 a | Client | Please select |
| 57 b | Product | Please select |
| 57 c | Channel | Please select |
| 57 d | Geography | Please select |
| 58 | | |
| 30 | Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | |
| 58 a | Does the Entity's Sanctions EWRA cover the controls | Please select |
| | Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | |
| 58 a | Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence | Please select |
| 58 a 58 b | Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance | Please select Please select |

| | | L |
|----------------|---|-----------------------------|
| 58 e | Name Screening | Please select |
| 58 f | Transaction Screening | Please select |
| 58 g | Training and Education Has the Entity's Sanctions EWRA been completed in | Please select |
| 59 | the last 12 months? | Please salect |
| 59 a | If N, provide the date when the last Sanctions | |
| 5¥ 8 | EWRA was completed. | |
| | Errich was completed. | |
| | | |
| | Contraction that all accounts and the distribution of the second | |
| 60 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 60 a | If N, clarify which guestions the difference/s relate to | |
| | and the branch/es that this applies to. | |
| | | |
| | | |
| 61 | If appropriate, provide any additional | |
| * ' | information/context to the answers in this section. | |
| | | |
| | | |
| 7 KYC | CDD and EDD | |
| 62 | Does the Entity verify the identity of the customer? | Please select |
| 63 | Do the Entity's policies and procedures set out when | |
| | CDD must be completed, e.g. at the time of | Please select |
| 1 | onboarding or within 30 days? | |
| 64 | Which of the following does the Entity gather and | |
| | retain when conducting CDD? Select all that apply | |
| 64 a | Customer identification | Please select |
| 64 b | Expected activity | Please select |
| 64 c | Nature of business/employment | Please select |
| 64 d | Ownership structure | Please select |
| 64 e | Product usage | Please select |
| 64 f | Purpose and nature of relationship | Please select |
| 64 g | Source of funds | Please select |
| 64 h | Source of wealth | Please select |
| 65 | Are each of the following identified: | |
| 65 a | Ultimate beneficial ownership | Please select |
| 65 a 1 | Are ultimate beneficial owners verified? | Please select |
| 65 b | Authorised signatories (where applicable) | Please select |
| 65 c | Key controllers | Please select |
| 65 d | Other relevant parties | Please select |
| 66 | What is the Entity's minimum (lowest) threshold | Please select |
| | applied to beneficial ownership identification? | |
| 67 | Does the due diligence process result in customers | Please select |
| | receiving a risk classification? | |
| 67 a | If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: | |
| | | |
| 67 a1 | Product Usage | Ptease select |
| 67 a2 67 a3 | Geography Business Type/Industry | Please select |
| 67 a4 | Legal Entity type | Please select Please select |
| 67 a5 | Adverse Information | Please select |
| 67 a 6 | Other (specify) | |
| | | |
| | | |
| | | |
| 68 | For high risk non-individual customers, is a site visit a | |
| | part of your KYC process? | Please select |
| 68 a | If Y, is this at | |
| 68 a1 | Onboarding | Please select |
| 68 a2 | KYC renewal | Please select |
| 68 a3 | Trigger event | Please select |
| 68 a4 | Other | Please select |
| 68 a4a | If yes, please specify "Other" | |
| | | |
| | | |
| | | |
| 69 | Does the Entity have a risk based approach to | |
| 1 | screening customers for Adverse Media/Negative | Please select |
| | News? | |
| 69 a | IFY, is this at | |
| 69 a1 | Onboarding | Please select |
| 69 a2 | KYC renewal | Please select |
| | "_i | |

| 69 a3 | Trigger event | Please select |
|----------------|---|---------------|
| 70 | What is the method used by the Entity to screen for Adverse Media/Negative News? | Please select |
| 71 | Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? | Please select |
| 71 a | If Y, is this at: | |
| 71 a1 | Onboarding | Please select |
| 71 82 | KYC renéwal | Please select |
| 71 a3 | Trigger event | Please select |
| 72 | What is the method used by the Entity to screen PEPs? | Please select |
| 73 | Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? | Please select |
| 74 | Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? | Please select |
| 74 a | If yes, select all that apply: | |
| 74 a 1 | Less than one year | Yes |
| 74 a2 | 1 – 2 years | Please select |
| 74 a3 | 3 – 4 years | Please select |
| 74 a4 74 a5 | 5 years or more | Please select |
| 74 a5 74 a6 | Trigger-based or perpetual monitoring reviews | Please select |
| 74 86 | Other (Please specify) | |
| 75 | Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews? | Please select |
| 76 | From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme? | |
| 76 a | Arms, defence, military | Please select |
| 76 b | Respondent Banks | Please selact |
| 76 b1 | If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? | Please select |
| 76 c | Embassies/Consulates | Please select |
| 76 d | Extractive industries | Please select |
| 76 e | Gambling customers | Please select |
| 76 f | General Trading Companies | Please select |
| 76 g | Marijuana-related Entities | Please select |
| 76 h | MSB/MVTS customers | Please select |
| 76 i | Non-account customers | Please select |
| 76 j | Non-Government Organisations | Please select |
| 76 k | Non-resident customers | Please select |
| 761 | Nuclear power | Please select |
| 76 m | Payment Service Providers | Please select |
| 76 n | PEPs | Please select |
| 76 0 | PEP Close Associates | Please select |
| 76 p | PEP Related | Please select |
| | Precious metals and stones | |
| 76 q | | Please select |
| 76 r | Red light businesses/Adult entertainment | Please select |
| 76 s | Regulated charities | Please select |
| 76 t | Shell banks | Please select |
| 76 u | Travel and Tour Companies | Please select |
| 76 V | Unregulated charities | Please select |
| 76 w | Used Car Dealers | Please select |
| 76 x 76 y | Virtual Asset Service Providers Other (specify) | Please select |
| 77 | If restricted, provide details of the restriction | |
| 78 | Does EDD require senior business management and/ or compliance approval? | Please select |
| | | |

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

| 93 | Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: | |
|-------------------|--|---------------|
| 93 a | FATF Recommendation 16 | Please select |
| 93 b | Local Regulations | Please select |
| 93 b† | If Y, specify the regulation | PRC AML LAW |
| 93 c | If N, explain | |
| 94 | Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages? | Please select |
| 95 | Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages? | Please select |
| 95 a | If Y, does the Entity have procedures to include beneficiary address including country in cross border payments? | Please select |
| 96 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 96 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 97 | If appropriate, provide any additional information/context to the answers in this section. | |
| 10. SANC | TIONS | I |
| 98 | Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? | Please select |
| 99 | Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)? | Please select |
| 100 | Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions laken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? | Please select |
| 101 | Does the Entity screen its customers, including beneficial ownership information callocted by the Entity, during onboarding and regularly thereafter against Sanctions Lists? | Please select |
| 102 | What is the method used by the Entity for sanctions screening? | Please select |
| 102 a | If 'automated' or 'both automated' and manual' selected: | |
| 102 a1 102 a1a | Are internal system of vendor-sourced tools used? If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/lool? | Please select |
| 102 a2 | When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110) | Please select |
| 103 | Does the Entity screen all sanctions relevant data, including at a minimum, entity and location, information, contained in cross border transactions against Sanctions Lists? | Please select |
| 104 | What is the method used by the Entity? | Please soloci |

| 105 | | |
|---|---|---|
| | Does the Entity have a data quality management | |
| | programme to ensure that complete data for all | Please select |
| | transactions are subject to sanctions screening? | |
| 106 | Select the Sanctions Lists used by the Entity in its | |
| | sanctions screening processes: | |
| 106 a | Consolidated United Nations Security Council | Please select |
| | Sanctions List (UN) | |
| 106 b | United States Department of the Treasury's Office of | Please select |
| | Foreign Assets Control (OFAC) | |
| 106 c | Office of Financial Sanctions Implementation HMT | Please select |
| | (OFSI) | |
| 106 dí | European Union Consolidated List (EU) | Please select |
| 106 e | Lists maintained by other G7 member countries | Please select |
| 106 f | Other (specify) | |
| | | |
| | | |
| | | |
| 107 | When regulatory authorities make updates to their | |
| | Sanctions list, how many business days before the entity updates their active manual and/or automated | |
| | screening systems against: | |
| | | |
| 107 a | Customer Data | Please select |
| 107 b | Transactions | Please setect |
| 108 | Does the Entity have a physical presence, e.g. | |
| | branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, | Pferra askat |
| | OFSI, EU or G7 member countries have enacted | Please select |
| | comprehensive jurisdiction-based Sanctions? | |
| 109 | Confirm that all responses provided in the above | ······ |
| 193 | Section are representative of all the LE's branches | Please select |
| 109 a | If N, darify which guestions the difference/s relate to | |
| | and the branch/es that this applies to. | |
| | | |
| | | |
| 110 | If appropriate, provide any additional | |
| 110 | information/context to the answers in this section. | |
| | | |
| | | |
| | NG & EDUCATION | · · · · · · · · · · · · · · · · · · · |
| 111 | Does the Entity provide mandatory training, which | r |
| | includes: | |
| | includes. | |
| 111 a | | |
| 111 a | Identification and reporting of transactions to government authorities | Please select |
| 111 а 111 b | Identification and reporting of transactions to | Please select |
| | Identification and reporting of transactions to government authorities | |
| | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, | Please select |
| | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant | |
| | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant | Please select |
| 111 b | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered | |
| 111 b | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering. | Please select Please select |
| 111 b 111 c | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations | Please select |
| 111 c 111 c 111 d 111 e | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture | Please select Please select Please select Please select |
| 111 c 111 c 111 d 111 e 111 f | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture | Please select Please select Please select |
| 111 c 111 c 111 d 111 e 111 f 112 | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to; | Please select |
| 111 c 111 c 111 d 111 e 111 f 112 112 a | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to; Board and Senior Committee Management | Please select |
| 111 b 111 c 111 d 111 e 111 f 112 a 112 b | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to; Board and Senior Committee Management 1st Line of Defence | Please select |
| 111 b 111 c 111 d 111 e 111 f 112 112 a 112 b 112 c | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence | Please select |
| 111 b 111 c 111 d 111 u 111 u 112 a 112 b 112 c 112 c 112 d | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1 st Line of Defence 3rd Line of Defence | Please select |
| 111 b 111 c 111 d 111 e 111 f 112 112 a 112 b 112 c | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to; Board and Senior Committee Management 1 st Line of Defence 3rd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have | Please select |
| 111 c 111 c 111 d 111 e 111 e 112 a 112 b 112 c 112 c 112 c 112 c | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to; Board and Senior Committee Management 1st Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced | Please select |
| 111 c 111 c 111 d 111 d 111 e 112 a 112 b 112 c 112 c 112 c 112 e 112 e 112 f | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to; Board and Senior Committee Management 1 st Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) | Please select |
| 111 c 111 c 111 d 111 e 111 e 112 a 112 b 112 c 112 c 112 c 112 c | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to; Board and Senior Committee Management 1st Line of Defence 3rd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training | Please select |
| 111 c 111 c 111 d 111 d 111 e 112 a 112 b 112 c 112 c 112 c 112 e 112 e 112 f | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is largeted to specific roles, responsibilities and | Please select |
| 111 b 111 c 111 d 111 e 111 f 112 a 112 b 112 c 112 c 112 c 112 c 112 c 112 c 112 f 113 | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1 st Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is largeted to specific reles, responsibilities and high-risk products, services and activities? | Please select |
| 111 c 111 c 111 d 111 d 111 e 112 a 112 b 112 c 112 c 112 c 112 e 112 e 112 f | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to; Board and Senior Committee Management 1 st Line of Defence 3rd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide ANL, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities? Does the Entity provide customised training for AML, | Please select |
| 111 c 111 c 111 d 111 d 111 d 112 d 112 d 112 d 112 d 112 f 113 114 | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to; Board and Senior Committee Management 1 st Line of Defence 3rd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities? Does the Entity provide customised training for AML, CTF and Sanctions stall? | Please select Please select |
| 111 b 111 c 111 d 111 e 111 f 112 a 112 b 112 c 112 c 112 c 112 c 112 c 112 c 112 f 113 | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to; Board and Senior Committee Management 1 st Line of Defence 3rd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide ANL, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities? Does the Entity provide customised training for AML, | Please select |

| 115 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
|----------------|--|-----------------------------|
| 116 | If appropriate, provide any additional Information/context to the answers in this section. | |
| | | |
| | | |
| 117 | Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)? | Please select |
| 118 | Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)? | Please select |
| 119 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 119 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 120 | If appropriate, provide any additional information/context to the answers in this section. | |
| 13. AUDIT | Letter and the second s | |
| 121 | In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? | Please select |
| 122 | How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: | |
| 122 a | Internal Audit Department | Please select |
| 122 b | External Third Party | Please select |
| 123 | Does the internal audit function or other independent third party cover the following areas: | |
| 123 a | AML, CTF, ABC, Fraud and Sanctions policy and procedures | Please select |
| 123 b | Enterprise Wide Risk Assessment | Please select |
| 123 c | Governance | Please select |
| 123 d | KYC/CDD/EDD and underlying methodologies | Please select |
| 123 e 123 f | Name Screening & List Management Reporting/Metrics & Management Information | Please select Please select |
| 123 g | Suspicious Activity Filing | Please select |
| 123 h | Technology | Please select |
| 123 i | Transaction Monitoring | Please select |
| 123 j | Transaction Screening including for sanctions | Please select |
| 123 K | Training & Education | Please select |
| 1231 | Other (specify) | |
| 124 | Are adverse findings from Internal & external audit tracked to completion and assessed for adequacy and completeness? | Please selact |
| 125 | Confirm that all responses provided in the above section are representative of all the LE's branches | Please selaci |
| 125 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 126 | If appropriate, provide any additional information/context to the answers in this section. | |
| 14, FRAU | JD ⁱⁿ e se terre d'a tradici d'activité de la secola de la s | |
| 127 | Does the Entity have policies in place addressing fraud risk? | Please select |
| 128 | Does the Entity have a dedicated team responsible for preventing & detecting fraud? | Please select |
| | | |

| 129 | Does the Entity have real time monitoring to detect | Please select | |
|-------------------------------------|---|--|--|
| | fraud? | | |
| 130 | Do the Entily's processes include gathering additional information to support its fraud controls, for example; IP address, GPS location, and/or device ID? | Please select | |
| 131 | Confirm that all responses provided in the above section are representative of all the LE's branches | Please selact | |
| 131 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | | |
| 132 | If appropriate, provide any additional information/context to the answers in this section. | | |
| Wolfsberg Gro Declaration S | on <u>Statement</u> up Correspondent Banking Due Diligence Questionnaire 2023 (Ci tatement (To be signed by Global Head of Correspondent Bani aundering, Chief Compliance Officer, Global Head of Financial | king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of | |
| BANCO BILE | BAO VIZCAYA ARGENTARIA S.A Shangh e i (Financial Institut | ion name) is fully committed to the fight against linancial crime and makes | |
| every effort to | premain in full compliance with all applicable financial crime law | s, regulations and standards in all of the jurisdictions in which it does business and holds accounts. | |
| | The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its egal and regulatory obligations. | | |
| The Financial standards. | The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards. | | |
| The Financial The information | The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trado Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months. | | |
| The Financial | Institution commits to file accurate supplemental information or | n a timety basis, | |
| l, the answers Institution, | (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that he answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial nstitution. | | |
| | Wenjie He (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this /dfsborg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution. | | |
| n= | (Signature & Da | te) | |
| Ure | Mostile 24 Nov Jor 3 (Signature & Date) | | |
| | | | |

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| the Wolfsberg Group | | | |
|-------------------------------|---|---|--|
| | Financial Institution Name: Location (Country) : | BBVA SA, NEW YORK BRANCH USA | |
| model are ma If a response | aterially similar to the LE Head Office. This questionnaire should not cover n | Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control nore than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. letails regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is d for that branch. | |
| No # | Question | Answer | |
| 1. ENTIT | Y & OWNERSHIP | | |
| 1 | Full Legal Name | BANCO BILBAO VIZCAYA ARGENTARIA S.A. | |
| 2 | Append a list of foreign branches which are covered by this questionnaire | BANCO BILBAO VIZCAYA ARGENTARIA S.A., NEW YORK BRANCH | |
| 3 | Full Legal (Registered) Address | 1345 Avenue of the Americas, 44th Floor, New York, NY 10105, United States of America | |
| 4 | Full Primary Business Address (if different from above) | | |
| 5 | Date of Entity incorporation/establishment | Licensed on Sept 17, 1990. | |
| 6 | Select type of ownership and append an ownership chart if available | | |
| 6 a | Publicly Traded (25% of shares publicly traded) | Yes | |
| 6 a1 | If Y, indicate the exchange traded on and ticker symbol | BBVA:SM Madrid, Barcelona, Bilbao, Valencia, London, Mexico, New York. | |
| 6 b | Member Owned/Mutual | No | |
| 6 C | Government or State Owned by 25% or more | No | |
| <u>6 d</u> | Privately Owned | No | |
| 6 d1 | If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more | | |
| 7 | % of the Entity's total shares composed of bearer shares | 0% | |
| 8 | Does the Entity, or any of its branches, operate under an | No | |
| 8 a | Offshore Banking License (OBL)? If Y, provide the name of the relevant branch/es which operate under an OBL | | |
| 9 | Does the Bank have a Virtual Bank License or provide services only through online channels? | no | |
| 10 | Name of primary financial regulator/supervisory authority | New York State Department of Financial Services (NYDFS), and Federal Reserve Bank | |
| 11 | Provide Legal Entity Identifier (LEI) if available | K8MS7FD7N5Z2WQ51AZ71 | |

| 12 | Provide the full legal name of the ultimate parent (if | |
|-------------------|---|---|
| | different from the Entity completing the DDQ) | |
| | | None |
| | | |
| | | |
| 13 | Jurisdiction of licensing authority and regulator of | |
| | ultimate parent | |
| | | SPAIN |
| | | |
| | | |
| 14 | Select the business areas applicable to the Entity | |
| 14 a | Retail Banking | No |
| 14 b | Private Banking | No |
| 14 c | Commercial Banking | Yes |
| 14 d | Transactional Banking | Yes |
| 14 e | Investment Banking | Yes |
| 14 C | Financial Markets Trading | Yes |
| 14 g | Securities Services/Custody | No |
| 14 h | Broker/Dealer | No |
| 14 i | Multilateral Development Bank | No |
| 14 j | Wealth Management | No |
| 14 k | Other (please explain) | |
| 14 K | | |
| | | |
| | | |
| | | |
| 15 | Does the Entity have a significant (10% or more) portfolio | |
| - | of non-resident customers or does it derive more than | |
| | 10% of its revenue from non-resident customers? (Non- | V |
| | resident means customers primarily resident in a | Yes |
| | different jurisdiction to the location where bank services | |
| | are provided) | |
| 15 a | If Y, provide the top five countries where the non-resident | 1. Peru |
| | customers are located. | 2. Colombia |
| | | 3. Argentina |
| | | 4. Bermuda |
| | | 5. Mexico |
| 16 | Select the closest value: | |
| 16 a | Number of employees | 51-200 |
| 16 b | Total Assets | Greater than \$500 million |
| 17 | Confirm that all responses provided in the above Section | No |
| | are representative of all the LE's branches. | |
| 17 a | If N, clarify which questions the difference/s relate to and | |
| | the branch/es that this applies to. | |
| | | See BBVA Due Diligence for global branches of BBVA S.A. |
| | | |
| | | |
| 18 | If appropriate, provide any additional information/context | |
| | to the answers in this section. | |
| | | |
| | | |
| | | |
| | CTS & SERVICES | |
| 19 | Does the Entity offer the following products and services: | |
| 19 a | Correspondent Banking | Yes |
| 19 a1 | IfY | |
| 19 a1a | Does the Entity offer Correspondent Banking services to | No |
| | domestic banks? | |
| 19 a1b | Does the Entity allow domestic bank clients to provide | No |
| 10 . 1 | downstream relationships? | |
| 19 a1c | Does the Entity have processes and procedures in place | Van |
| | to identify downstream relationships with domestic banks? | Yes |
| 10 01 0 | | |
| 19 a1d | Does the Entity offer Correspondent Banking services to | Yes |
| 10 010 | foreign banks? | |
| 19 a1e | Does the Entity allow downstream relationships with | No |
| 19 a1f | foreign banks? Does the Entity have processes and procedures in place | |
| 19 411 | to identify downstream relationships with foreign banks? | Yes |
| 19 a1g | Does the Entity offer Correspondent Banking services to | |
| isaiy | regulated Money Services Businesses (MSBs)/Money | |
| | Value Transfer Services (MVTSs)? | No |
| | | |
| 19 a1h | Does the Entity allow downstream relationships with | |
| | MSBs, MVTSs, or Payment Service Provider (PSPs)? | |
| 19 a1h1 | MSPo | No |
| | MSBs | |
| 19 a1h2 | MVTSs | No |
| 19 a1h3 | MVTSs PSPs | No No |
| | MVTSs PSPs Does the Entity have processes and procedures in place | No |
| 19 a1h3 | MVTSs PSPs Does the Entity have processes and procedures in place to identify downstream relationships with MSBs | |
| 19 a1h3 19 a1i | MVTSs PSPs Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs? | No Yes |
| 19 a1h3 | MVTSs PSPs Does the Entity have processes and procedures in place to identify downstream relationships with MSBs | No |

| 40.1 | | N. |
|--|---|--|
| 19 d | Domestic Bulk Cash Delivery | No |
| 19 e | Hold Mail | No |
| | | |
| 19 f | International Cash Letter | No |
| 19 g | Low Price Securities | No |
| | | |
| 19 h | Payable Through Accounts | No |
| 19 i | Payment services to non-bank entities who may then | |
| 191 | | |
| | offer third party payment services to their customers? | No |
| | | No |
| | | |
| | | |
| 19 i1 | If Y, please select all that apply below? | |
| | | |
| 19 i2 | Third Party Payment Service Providers | |
| 19 i3 | Virtual Asset Service Providers (VASPs) | |
| | | |
| 19 i4 | eCommerce Platforms | |
| 19 i5 | Other - Please explain | |
| 1315 | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| 19 j | Private Banking | No |
| | | |
| 19 k | Remote Deposit Capture (RDC) | No |
| 19 | Sponsoring Private ATMs | No |
| | | |
| 19 m | Stored Value Instruments | No |
| 19 n | Trade Finance | Yes |
| | | |
| 19 o | Virtual Assets | No |
| 19 p | For each of the following please state whether you offer | |
| 19 h | | |
| | the service to walk-in customers and if so, the applicable | |
| | level of due diligence: | |
| | | |
| 19 p1 | Check cashing service | No |
| 19 p1a | If yes, state the applicable level of due diligence | |
| 13 μ14 | | |
| 19 p2 | Wire transfers | No |
| | If yes, state the applicable level of due diligence | |
| | | |
| 19 p3 | Foreign currency conversion | No |
| | If yes, state the applicable level of due diligence | |
| 19 p3a | | |
| 19 p4 | Sale of Monetary Instruments | No |
| | | |
| | If yes, state the applicable level of due diligence | |
| 19 p5 | If you offer other services to walk-in customers please | |
| | | |
| | provide more detail here, including describing the level of | |
| | due diligence. | |
| | ado angonoo. | |
| | | |
| | | |
| | | |
| 19 q | Other high-risk products and services identified by the | |
| | Entity (please specify) | |
| | | FX Trading Third Party |
| | | |
| | | Demand Deposit Accounts (Checking, Savings) |
| | | |
| | | |
| 20 | Confirm that all responses provided in the above Section | |
| 20 | | No |
| | are representative of all the LE's branches. | |
| 20 a | If N, clarify which questions the difference/s relate to and | |
| 20 a | In N, clarity which questions the unerence/s relate to and | |
| | the branch/es that this applies to. | |
| | | See BBVA Due Diligence for global branches of BBVA S.A. |
| | | See BbyA Due Diligence for global branches of BbyA S.A. |
| | | |
| | | |
| | | |
| 21 | If appropriate, provide any additional information/context | |
| | | |
| | to the answers in this section. | |
| | | |
| | | |
| | | |
| | | |
| 2 AMI OT | | |
| | F & SANCTIONS PROGRAMME | |
| 22 | Does the Entity have a programme that sets minimum | |
| - | | |
| | AML, CTF and Sanctions standards regarding the | |
| | following components: | |
| 22 a | | |
| | Appointed Officer with sufficient experience/expertise | |
| 22 b | Appointed Officer with sufficient experience/expertise | Yes |
| | | |
| 22.0 | Adverse Information Screening | Yes |
| | Adverse Information Screening Beneficial Ownership | Yes Yes |
| 22 c 22 d | Adverse Information Screening Beneficial Ownership | Yes Yes |
| 22 d | Adverse Information Screening Beneficial Ownership Cash Reporting | Yes Yes Yes |
| 22 d 22 e | Adverse Information Screening Beneficial Ownership Cash Reporting CDD | Yes Yes Yes Yes |
| 22 d 22 e | Adverse Information Screening Beneficial Ownership Cash Reporting CDD | Yes Yes Yes Yes |
| 22 d 22 e 22 f | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD | Yes Yes Yes Yes Yes |
| 22 d 22 e 22 f 22 g | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing | Yes Yes Yes Yes |
| 22 d 22 e 22 f 22 g | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing | Yes Yes Yes Yes Yes Yes |
| 22 d 22 e 22 f 22 g 22 h | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review | Yes Yes Yes Yes Yes Yes |
| 22 d 22 e 22 f 22 g 22 h | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing | Yes Yes Yes Yes Yes Yes |
| 22 d 22 e 22 f 22 g 22 h 22 h 22 i | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures | Yes Yes Yes Yes Yes Yes Yes Yes |
| 22 d 22 e 22 f 22 g 22 h 22 h 22 i 22 j | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening | Yes Yes Yes Yes Yes Yes Yes Yes |
| 22 d 22 e 22 f 22 g 22 h 22 h 22 i | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures | Yes Yes Yes Yes Yes Yes Yes Yes |
| 22 d 22 e 22 f 22 g 22 h 22 h 22 i 22 i 22 j 22 k | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment | Yes Yes Yes Yes Yes Yes Yes Yes Yes |
| 22 d 22 e 22 f 22 g 22 h 22 i 22 i 22 j 22 j 22 k 22 l | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions | Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes |
| 22 d 22 e 22 f 22 g 22 h 22 i 22 i 22 j 22 j 22 k 22 l | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions | Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes |
| 22 d 22 e 22 f 22 g 22 h 22 h 22 i 22 j 22 k 22 z 22 k 22 l 22 m | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions Suspicious Activity Reporting | Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes |
| 22 d 22 e 22 f 22 g 22 h 22 i 22 i 22 j 22 j 22 k 22 l | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions Suspicious Activity Reporting Training and Education | Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes |
| 22 d 22 e 22 f 22 g 22 h 22 h 22 j 22 k 22 j 22 k 22 l 22 k 22 l 22 m 22 n | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions Suspicious Activity Reporting Training and Education | Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes |
| 22 d 22 e 22 f 22 g 22 h 22 i 22 i 22 j 22 k 22 j 22 k 22 j 22 k 22 g 22 m 22 n 22 o | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions Suspicious Activity Reporting Training and Education Transaction Monitoring | Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes |
| 22 d 22 e 22 f 22 g 22 h 22 h 22 j 22 k 22 j 22 k 22 l 22 k 22 l 22 m 22 n | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions Suspicious Activity Reporting Training and Education Transaction Monitoring How many full time employees are in the Entity's AML, | Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes |
| 22 d 22 e 22 f 22 g 22 h 22 i 22 i 22 j 22 k 22 j 22 k 22 j 22 k 22 g 22 m 22 n 22 o | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions Suspicious Activity Reporting Training and Education Transaction Monitoring How many full time employees are in the Entity's AML, | Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes |
| 22 d 22 e 22 f 22 g 22 h 22 i 22 i 22 i 22 i 22 z 22 i 22 z 22 i 22 z 22 z | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions Suspicious Activity Reporting Training and Education Transaction Monitoring How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? | Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes |
| 22 d 22 e 22 f 22 g 22 h 22 i 22 i 22 j 22 k 22 j 22 k 22 i 22 k 22 n 22 n 22 o | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions Suspicious Activity Reporting Training and Education Transaction Monitoring How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? Is the Entity's AML, CTF & Sanctions policy approved at | Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes |
| 22 d 22 e 22 f 22 g 22 h 22 i 22 i 22 i 22 z 22 i 22 z 22 i 22 z 22 z | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions Suspicious Activity Reporting Training and Education Transaction Monitoring How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? Is the Entity's AML, CTF & Sanctions policy approved at | Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes |
| 22 d 22 e 22 f 22 g 22 h 22 i 22 i 22 i 22 z 22 i 22 z 22 i 22 z 22 z | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions Suspicious Activity Reporting Training and Education Transaction Monitoring How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior | Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes |
| 22 d 22 e 22 f 22 g 22 h 22 i 22 i 22 i 22 z 22 i 22 z 22 i 22 z 22 z | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions Suspicious Activity Reporting Training and Education Transaction Monitoring How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in | Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes |
| 22 d 22 e 22 f 22 g 22 h 22 i 22 i 22 i 22 z 22 i 22 z 22 i 22 z 22 z | Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions Suspicious Activity Reporting Training and Education Transaction Monitoring How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior | Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes |

| 25 | Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme? | Yes |
|------------|--|---|
| 26 | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? | Yes |
| 26 a | If Y, provide further details | Back Office real-time message and payment screening for Sanctions by team based in Madrid. AML and Sanctions BAU support by contractors based in U.S. |
| 27 | Does the entity have a whistleblower policy? | Yes |
| 28 | Confirm that all responses provided in the above Section are representative of all the LE's branches | No |
| 28 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | See BBVA Due Diligence for global branches of BBVA S.A. |
| 29 | If appropriate, provide any additional information/context to the answers in this section. | |
| 4. ANTI BR | IBERY & CORRUPTION | |
| 30 | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? | Yes |
| 31 | Does the Entity have an enterprise wide programme that sets minimum ABC standards? | Yes |
| 32 | Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? | Yes |
| 33 | Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? | Yes |
| 34 | Is the Entity's ABC programme applicable to: | Both joint ventures and third parties acting on behalf of the Entity |
| 35 | Does the Entity have a global ABC policy that: | |
| 35 a | Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage | Yes |
| 35 b | Includes enhanced requirements regarding interaction with public officials? | Yes |
| 35 c | Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? | Yes |
| 36 | Does the Entity have controls in place to monitor the effectiveness of their ABC programme? | Yes |
| 37 | Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? | Yes |
| 38 | Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? | Yes |
| 38 a | If N, provide the date when the last ABC EWRA was completed. | |
| 39 | Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? | Yes |
| 40 | Does the Entity's ABC EWRA cover the inherent risk components detailed below: | |
| 40 a | Potential liability created by intermediaries and other | Yes |
| 40 b | third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries | Yes |
| 40 c | Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials | Yes |
| 40 d | Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions | Yes |
| 40 e | Changes in business activities that may materially increase the Entity's corruption risk | Yes |

| 41 | Does the Entity's internal audit function or other independent third party cover ABC Policies and | Yoo |
|------------|---|---|
| | Procedures? | Yes |
| 42 | Does the Entity provide mandatory ABC training to: | |
| 42 a | Board and senior Committee Management | Yes |
| 42 b | 1st Line of Defence | Yes |
| 42 c | 2nd Line of Defence | Yes |
| 42 d | 3rd Line of Defence | Yes |
| 42 e | Third parties to which specific compliance activities subject to ABC risk have been outsourced | No |
| 42 f | Non-employed workers as appropriate (contractors/consultants) | Yes |
| 43 | Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities? | Yes |
| 44 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Yes |
| 44 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 45 | If appropriate, provide any additional information/context to the answers in this section. | Regarding question 42e, it should be noted that BBVA does not provide training to all non-employed workers but it does provide training to certain high-risk non-employed workers such as agents. BBVA requires all its third parties to certify their commitment to comply with all applicable anti-corruption laws. |
| 5. AML, CT | F & SANCTIONS POLICIES & PROCEDURES | |
| 46 | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: | |
| 46 a | Money laundering | Yes |
| 46 b | Terrorist financing | Yes |
| 46 c | Sanctions violations | Yes |
| 47 | Are the Entity's policies and procedures updated at least annually? | Yes |
| 48 | Has the Entity chosen to compare its policies and procedures against: | |
| 48 a | U.S. Standards | Yes |
| 48 a1 | If Y, does the Entity retain a record of the results? | Yes |
| 48 b | EU Standards | Yes |
| 48 b1 | If Y, does the Entity retain a record of the results? | Yes |
| 49 | Does the Entity have policies and procedures that: | |
| 49 a | Prohibit the opening and keeping of anonymous and fictitious named accounts | Yes |
| 49 b | Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs | Yes |
| 49 c | Prohibit dealing with other entities that provide banking services to unlicensed banks | Yes |
| 49 d | Prohibit accounts/relationships with shell banks | Yes |
| 49 e | Prohibit dealing with another entity that provides services to shell banks | Yes |
| 49 f | Prohibit opening and keeping of accounts for Section 311 designated entities | Yes |
| 49 g | Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents | Yes |
| 49 h | Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates | Yes |
| 49 i | Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees | Yes |
| 49 j | Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk | Yes |
| 49 k | Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates | Yes |
| 49 | Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship | Yes |
| 49 m | Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News | Yes |
| 49 n | Outline the processes for the maintenance of internal "watchlists" | Yes |
| 50 | Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business? | Yes |
| 51 | Does the Entity have record retention procedures that comply with applicable laws? | Yes |

| 51 a | If Y, what is the retention period? | |
|--------------|---|---|
| | | - |
| | | 5 years or more |
| | | |
| 52 | Confirm that all responses provided in the above Section | No |
| | are representative of all the LE's branches | NC |
| | If N, clarify which questions the difference/s relate to and | |
| | the branch/es that this applies to. | See BBVA Due Diligence for global branches of BBVA S.A. |
| | | See Day Due Diligence for global branches of DDA G.A. |
| | | |
| | If appropriate, provide any additional information/context | |
| | to the answers in this section. | |
| | | |
| | | |
| 6. AML, CTF | & SANCTIONS RISK ASSESSMENT | |
| | Does the Entity's AML & CTF EWRA cover the inherent | |
| | risk components detailed below: | |
| | Client | Yes |
| | Product Channel | Yes Yes |
| | Geography | Yes |
| | Does the Entity's AML & CTF EWRA cover the controls | 163 |
| | effectiveness components detailed below: | |
| | Transaction Monitoring | Yes |
| | Customer Due Diligence | Yes |
| | PEP Identification | Yes |
| | Transaction Screening Name Screening against Adverse Media/Negative News | Yes Yes |
| | Training and Education | Yes |
| | Governance | Yes |
| | Management Information | Yes |
| 56 | Has the Entity's AML & CTF EWRA been completed in | Yes |
| | the last 12 months? | |
| 56 a | If N, provide the date when the last AML & CTF EWRA was completed. | |
| | was completed. | |
| | | |
| | | |
| | Does the Entity's Sanctions EWRA cover the inherent | |
| | risk components detailed below: | |
| | Client Product | Yes Yes |
| | Channel | Yes |
| 57 d | Geography | Yes |
| | Does the Entity's Sanctions EWRA cover the controls | |
| | effectiveness components detailed below: | |
| | Customer Due Diligence | Yes |
| 58 b 58 c | Governance List Management | Yes Yes |
| 58 d | Management Information | Yes |
| | Name Screening | Yes |
| | Transaction Screening | Yes |
| 58 g | Training and Education | Yes |
| 59 | Has the Entity's Sanctions EWRA been completed in the | Yes |
| 50 0 | last 12 months? | |
| 59 a | If N, provide the date when the last Sanctions EWRA was completed. | |
| | was completed. | |
| | | |
| | | |
| 60 | Confirm that all responses provided in the above Section | No |
| | are representative of all the LE's branches If N, clarify which questions the difference/s relate to and | |
| 60 a | the branch/es that this applies to. | |
| | | See BBVA Due Diligence for global branches of BBVA S.A. |
| | | |
| | | |
| 61 | If appropriate, provide any additional information/context | |
| | to the answers in this section. | |
| | | |
| | | |
| 7. KYC, CD | D and EDD | |
| | Does the Entity verify the identity of the customer? | Yes |
| | Do the Entity's policies and procedures set out when | |
| | CDD must be completed, e.g. at the time of onboarding | Yes |
| | or within 30 days? | |
| | Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: | |
| | | |

| 64 a | Customer identification | Yes |
|--|--|--|
| 64 b | Expected activity | Yes |
| 64 c | Nature of business/employment | Yes |
| 64 d | Ownership structure | Yes |
| 64 e | Product usage | Yes |
| 64 f | Purpose and nature of relationship | Yes |
| 64 g | Source of funds | Yes |
| 64 h | Source of wealth | Yes |
| 65 | Are each of the following identified: | |
| 65 a | Ultimate beneficial ownership | Yes |
| | Are ultimate beneficial owners verified? | |
| 65 a1 | | Yes |
| 65 b | Authorised signatories (where applicable) | Yes |
| 65 c | Key controllers | Yes |
| 65 d | Other relevant parties | Yes |
| 66 | What is the Entity's minimum (lowest) threshold applied | 10% |
| ~7 | to beneficial ownership identification? | |
| 67 | Does the due diligence process result in customers | Yes |
| 67 - | receiving a risk classification? If Y, what factors/criteria are used to determine the | |
| 67 a | | |
| 07 -4 | customer's risk classification? Select all that apply: | |
| 67 a1 | Product Usage | Yes |
| 67 a2 | Geography | Yes |
| 67 a3 | Business Type/Industry | Yes |
| 67 a4 | Legal Entity type | Yes |
| 67 a5 | Adverse Information | Yes |
| 67 a6 | Other (specify) | |
| | | We also use the duration of the relationship, the current activity/trading volume, and the sanctions screening |
| | | risk. |
| | | |
| | | |
| 68 | For high risk non-individual customers, is a site visit a | Yes |
| <u> </u> | part of your KYC process? | |
| 68 a | If Y, is this at: | |
| 68 a1 | Onboarding | Yes |
| 68 a2 | KYC renewal | Yes |
| 68 a3 | Trigger event | Yes |
| 68 a4 | Other | No |
| 68 a4a | If yes, please specify "Other" | |
| | | |
| | | |
| | | |
| | | |
| | | |
| 69 | Does the Entity have a risk based approach to screening | |
| 69 | Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? | Yes |
| | customers for Adverse Media/Negative News? | Yes |
| 69 a | customers for Adverse Media/Negative News? If Y, is this at: | |
| 69 69 a 69 a1 69 a2 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding | Yes |
| 69 a 69 a1 69 a2 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal | Yes Yes |
| 69 a 69 a1 69 a2 69 a3 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event | Yes Yes Yes |
| 69 a 69 a1 69 a2 69 a3 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for | Yes Yes |
| 69 a 69 a1 69 a2 69 a3 70 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? | Yes Yes Yes |
| 69 a 69 a1 69 a2 69 a3 70 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening | Yes Yes Yes Combination of automated and manual |
| 69 a 69 a1 69 a2 69 a3 70 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether | Yes Yes Yes |
| 69 a 69 a1 69 a2 69 a3 70 71 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? | Yes Yes Yes Combination of automated and manual |
| 69 a 69 a1 69 a2 69 a3 70 71 71 a | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: | Yes Yes Yes Combination of automated and manual Yes |
| 69 a 69 a1 69 a2 69 a3 70 71 71 71 a 71 a | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding | Yes Yes Yes Combination of automated and manual Yes |
| 69 a 69 a1 69 a2 69 a3 70 71 71 71 a 71 a1 71 a2 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal | Yes Yes Yes Combination of automated and manual Yes Yes Yes |
| 69 a 69 a1 69 a2 69 a3 70 71 71 71 a 71 a1 71 a2 71 a3 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event | Yes Yes Yes Combination of automated and manual Yes |
| 69 a 69 a1 69 a2 69 a3 70 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal | Yes Yes Combination of automated and manual Yes Yes Yes Yes |
| 69 a 69 a1 69 a2 69 a3 70 71 71 71 a 71 a1 71 a2 71 a3 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event | Yes Yes Yes Combination of automated and manual Yes Yes Yes |
| 69 a 69 a1 69 a2 69 a3 70 71 71 71 a 71 a1 71 a2 71 a3 72 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? | Yes Yes Combination of automated and manual Yes Yes Yes Yes |
| 69 a 69 a1 69 a2 69 a3 70 71 71 71 a 71 a1 71 a2 71 a3 72 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes | Yes Yes Combination of automated and manual Yes Yes Yes Yes Yes Combination of automated and manual |
| 69 a 69 a1 69 a2 69 a3 70 71 71 71 a 71 a1 71 a2 71 a3 72 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening | Yes Yes Combination of automated and manual Yes Yes Yes Yes |
| 69 a 69 a1 69 a2 69 a3 70 71 71 71 a 71 a1 71 a2 71 a3 72 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether | Yes Yes Combination of automated and manual Yes Yes Yes Yes Yes Combination of automated and manual |
| 69 a 69 a1 69 a2 69 a3 70 71 71 71 a 71 a1 71 a2 71 a3 72 73 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? | Yes Yes Combination of automated and manual Yes Yes Yes Yes Yes Combination of automated and manual Yes |
| 69 a 69 a1 69 a2 69 a3 70 71 71 71 a 71 a1 71 a2 71 a3 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk | Yes Yes Combination of automated and manual Yes Yes Yes Yes Yes Combination of automated and manual |
| 69 a 69 a1 69 a2 69 a3 70 71 71 71 a 71 a1 71 a2 71 a3 72 73 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? | Yes Yes Combination of automated and manual Yes Yes Yes Yes Yes Combination of automated and manual Yes |
| 69 a 69 a1 69 a2 69 a3 70 71 71 a 71 a1 71 a2 71 a3 72 73 74 a | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? If yes, select all that apply: | Yes Yes Yes Combination of automated and manual Yes Yes Yes Yes Combination of automated and manual Yes |
| 69 a 69 a1 69 a2 69 a3 70 71 71 a1 71 a2 71 a3 72 73 74 74 a1 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? If yes, select all that apply: Less than one year | Yes Yes Combination of automated and manual Yes Yes Yes Yes Combination of automated and manual Yes Combination of automated and manual Yes |
| 69 a 69 a1 69 a2 69 a3 70 71 71 a1 71 a2 71 a3 72 73 74 a 74 a1 74 a2 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? If yes, select all that apply: Less than one year 1 – 2 years | Yes Yes Yes Combination of automated and manual Yes Yes Yes Yes Combination of automated and manual Yes |
| 69 a 69 a1 69 a2 69 a3 70 71 71 a1 71 a2 71 a3 72 73 74 a 74 a1 74 a3 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? If yes, select all that apply: Less than one year 1 - 2 years 3 - 4 years | Yes Yes Combination of automated and manual Yes Yes Yes Yes Combination of automated and manual Yes Combination of automated and manual Yes Yes |
| 69 a 69 a1 69 a2 69 a3 70 71 71 a1 71 a2 71 a3 72 73 74 74 a1 74 a2 74 a3 74 a4 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? If yes, select all that apply: Less than one year 1 – 2 years 5 years or more | Yes Yes Combination of automated and manual Yes Yes Yes Yes Combination of automated and manual Yes Combination of automated and manual Yes No |
| 69 a 69 a1 69 a2 69 a3 70 71 71 a 71 a1 71 a2 71 a3 72 73 74 a 74 a1 74 a3 74 a5 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? If yes, select all that apply: Less than one year 1 – 2 years 3 – 4 years 5 years or more Trigger-based or perpetual monitoring reviews | Yes Yes Combination of automated and manual Yes Yes Yes Yes Combination of automated and manual Yes Combination of automated and manual Yes Yes |
| 69 a 69 a1 69 a2 69 a3 70 71 71 a1 71 a2 71 a3 72 73 74 74 a1 74 a2 74 a3 74 a4 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? If yes, select all that apply: Less than one year 1 – 2 years 5 years or more | Yes Yes Combination of automated and manual Yes Yes Yes Yes Combination of automated and manual Yes Combination of automated and manual Yes No |
| 69 a 69 a1 69 a2 69 a3 70 71 71 a 71 a1 71 a2 71 a3 72 73 74 a 74 a1 74 a3 74 a5 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? If yes, select all that apply: Less than one year 1 – 2 years 3 – 4 years 5 years or more Trigger-based or perpetual monitoring reviews | Yes Yes Combination of automated and manual Yes Yes Yes Yes Combination of automated and manual Yes Combination of automated and manual Yes No |
| 69 a 69 a1 69 a2 69 a3 70 71 71 a 71 a1 71 a2 71 a3 72 73 74 a 74 a1 74 a3 74 a5 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? If yes, select all that apply: Less than one year 1 – 2 years 3 – 4 years 5 years or more Trigger-based or perpetual monitoring reviews | Yes Yes Combination of automated and manual Yes Yes Yes Yes Yes Combination of automated and manual Yes Yes Yes Combination of automated and manual Yes No |
| 69 a 69 a1 69 a2 69 a3 70 71 71 a 71 a1 71 a2 71 a3 72 73 74 a 74 a1 74 a3 74 a5 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? If yes, select all that apply: Less than one year 1 – 2 years 3 – 4 years 5 years or more Trigger-based or perpetual monitoring reviews | Yes Yes Combination of automated and manual Yes Yes Yes Yes Yes Combination of automated and manual Yes Yes Yes Combination of automated and manual Yes No |
| 69 a 69 a1 69 a2 69 a3 70 71 71 a1 71 a2 71 a3 72 73 74 a 74 a1 74 a2 74 a3 74 a5 74 a6 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? If yes, select all that apply: Less than one year 1 – 2 years 3 – 4 years 5 years or more Trigger-based or perpetual monitoring reviews Other (Please specify) | Yes Yes Combination of automated and manual Yes Yes Yes Yes Combination of automated and manual Yes Combination of automated and manual Yes No |
| 69 a 69 a1 69 a2 69 a3 70 71 71 a 71 a1 71 a2 71 a3 72 73 74 a 74 a1 74 a3 74 a5 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? If what is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? If yes, select all that apply: Less than one year 1 – 2 years 3 – 4 years 5 years or more Trigger-based or perpetual monitoring reviews Other (Please specify) | Yes Yes Combination of automated and manual Yes Yes Yes Yes Combination of automated and manual Yes Combination of automated and manual Yes No |
| 69 a 69 a1 69 a2 69 a3 70 71 71 a1 71 a2 71 a3 72 73 74 a1 74 a2 74 a3 74 a4 74 a5 74 a6 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? If yes, select all that apply: Less than one year 1 – 2 years 3 – 4 years 5 years or more Trigger-based or perpetual monitoring reviews Other (Please specify) | Yes Yes Yes Combination of automated and manual Yes Yes Yes Yes Yes Combination of automated and manual Yes Yes Yes Yes Yes No Yes Yes No Yes Yes No Yes |
| 69 a 69 a1 69 a2 69 a3 70 71 71 a1 71 a2 71 a3 72 73 74 a 74 a1 74 a2 74 a3 74 a5 74 a6 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? If yes, select all that apply: Less than one year 1 – 2 years 3 – 4 years 5 years or more Trigger-based or perpetual monitoring reviews Other (Please specify) Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews? From the list below, which categories of customers or | Yes Yes Yes Combination of automated and manual Yes Yes Yes Yes Yes Combination of automated and manual Yes Yes Yes Yes Yes No Yes Yes No Yes Yes No Yes |
| 69 a 69 a1 69 a2 69 a3 70 71 71 a1 71 a2 71 a3 72 73 74 a1 74 a2 74 a3 74 a4 74 a5 74 a6 | customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? If yes, select all that apply: Less than one year 1 – 2 years 3 – 4 years 5 years or more Trigger-based or perpetual monitoring reviews Other (Please specify) | Yes Yes Yes Combination of automated and manual Yes Yes Yes Yes Yes Combination of automated and manual Yes Yes Yes Yes Yes No Yes Yes No Yes Yes No Yes |

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

| 85 a | If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? | Yes |
|-----------|--|--|
| 86 | Does the Entity have policies, procedures and processes | |
| | to review and escalate matters arising from the monitoring of customer transactions and activity? | Yes |
| 87 | Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? | Yes |
| 88 | Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? | Yes |
| 89 | Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? | Yes |
| 90 | Confirm that all responses provided in the above Section are representative of all the LE's branches | No |
| 90 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to | See BBVA Due Diligence for global branches of BBVA S.A. |
| 91 | If appropriate, provide any additional information/context to the answers in this section. | |
| | T TRANSPARENCY | |
| 92 | Does the Entity adhere to the Wolfsberg Group Payment | V |
| | Transparency Standards? | Yes |
| 93 | Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: | |
| 93 a | FATF Recommendation 16 | Yes |
| 93 b | Local Regulations | Yes |
| 93 b1 | If Y, specify the regulation | Bank Secrecy Act (BSA) rule [31 CFR 103.33(g)] (also referred to as the Travel rule) in the U.S. requires banks to transmit certain information to other banks |
| 93 c | If N, explain | |
| 94 | Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages? | Yes |
| 95 | Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages? | Yes |
| 95 a | If Y, does the Entity have procedures to include beneficiary address including country in cross border payments? | Yes |
| 96 | Confirm that all responses provided in the above Section are representative of all the LE's branches | No |
| 96 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | See BBVA Due Diligence for global branches of BBVA S.A. |
| 97 | If appropriate, provide any additional information/context to the answers in this section. | |
| 10. SANCT | IONS | l |
| 98 | Does the Entity have a Sanctions Policy approved by | |
| | management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? | Yes |
| 99 | Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)? | Yes |

| 100 | Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border | Yes |
|-----------------------|--|---|
| | transactions? | |
| 101 | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? | Yes |
| 102 | What is the method used by the Entity for sanctions screening? | Both Automated and Manual |
| 102 a | If 'automated' or 'both automated and manual' selected: | |
| 102 a1 | Are internal system of vendor-sourced tools used? | Vendor-sourced tools |
| 102 a1a | If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? | Accuity Inc. and Lexis Nexis Risk Solutions |
| 102 a2 | When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110) | < 1 year |
| 103 | Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? | Yes |
| 104 | What is the method used by the Entity? | Combination of automated and manual |
| 105 | Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening? | Yes |
| 106 | Select the Sanctions Lists used by the Entity in its sanctions screening processes: | |
| 106 a | Consolidated United Nations Security Council Sanctions List (UN) | Used for screening customers and beneficial owners and for filtering transactional data |
| 106 b | United States Department of the Treasury's Office of Foreign Assets Control (OFAC) | Used for screening customers and beneficial owners and for filtering transactional data |
| 106 c | Office of Financial Sanctions Implementation HMT (OFSI) | Used for screening customers and beneficial owners and for filtering transactional data |
| 106 d | European Union Consolidated List (EU) | Used for screening customers and beneficial owners and for filtering transactional data |
| <u>106 e</u> 106 f | Lists maintained by other G7 member countries | Used for screening customers and beneficial owners and for filtering transactional data |
| | Other (specify) | |
| 107 | When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against: | |
| 107 a | Customer Data | Same day to 2 business days |
| 107 b | Transactions | Same day to 2 business days |
| 108 | Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions? | Νο |
| 109 | Confirm that all responses provided in the above Section are representative of all the LE's branches | No |
| 109 a | If N, clarify which questions the difference/s relate to and | |
| | the branch/es that this applies to. | See BBVA Due Diligence for global branches of BBVA S.A. |
| 110 | If appropriate, provide any additional information/context to the answers in this section. | |
| | | |
| 111 | Does the Entity provide mandatory training, which | |
| 111 a | includes: Identification and reporting of transactions to government | Yes |
| 111 b | authorities Examples of different forms of money laundering, | |
| | terrorist financing and sanctions violations relevant for the types of products and services offered | Yes |
| 111 c | Internal policies for controlling money laundering, terrorist financing and sanctions violations | Yes |
| 111 d | New issues that occur in the market, e.g. significant regulatory actions or new regulations | Yes |
| | | |

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

| 125 | Confirm that all responses provided in the above section are representative of all the LE's branches | No |
|--|---|--|
| 125 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | See BBVA Due Diligence for global branches of BBVA S.A. |
| 126 | If appropriate, provide any additional information/context to the answers in this section. | |
| 14. FRAUD | | |
| 127 | Does the Entity have policies in place addressing fraud risk? | Yes |
| 128 | Does the Entity have a dedicated team responsible for preventing & detecting fraud? | Yes |
| 129 | Does the Entity have real time monitoring to detect fraud? | Yes |
| 130 | Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID? | Yes |
| 131 | Confirm that all responses provided in the above section are representative of all the LE's branches | No |
| 131 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | See BBVA Due Diligence for global branches of BBVA S.A. |
| 132 | If appropriate, provide any additional information/context to the answers in this section. | |
| Wolfsberg Gro Declaration Sta Chief Complian BBVA NE every effort to the The Financial I obligations. The Financial I provided in this | nce Officer, Global Head of Financial Crimes Compliance OR equence of the provided | g or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, uivalent) n name) is fully committed to the fight against financial crime and makes regulations and standards in all of the jurisdictions in which it does business and holds accounts. and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory parties to transactions in international payments and has adopted/is committed to adopting these standards. with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information ess frequently than every eighteen months. |
| The Financial I | Institution commits to file accurate supplemental information on a | a timely basis. |
| I, <u>Kris</u> complete and o | CBDDQ are complete and correct to my honest belief, and that I | Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in I am authorised to execute this declaration on behalf of the Financial Institution. alent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are his declaration on behalf of the Financial Institution. |

the Wolfsberg Group

Financial Institution Name: Location (Country) :

| | No# | Question | Answer |
|-----|--------|--|--------|
| 1. | ENTITY | & OWNERSHIP | |
| 1 | | Full Legal Name | |
| 1 | | Tuli Legar Marile | |
| | | | |
| | | | |
| | | | |
| 2 | | Append a list of foreign branches which are covered | |
| | | by this questionnaire | |
| | | | |
| | | | |
| | | | |
| 3 | | Full Legal (Registered) Address | |
| | | | |
| | | | |
| | | | |
| _ | | | |
| 4 | | Full Primary Business Address (if different from | |
| | | above) | |
| | | | |
| | | | |
| 5 | | Date of Entity incorporation/establishment | |
| 5 | | Bate of Entry moorporation/establishinent | |
| | | | |
| | | | |
| | | | |
| 6 | | Select type of ownership and append an ownership | |
| | | chart if available | |
| 6 8 | 9 | Publicly Traded (25% of shares publicly traded) | |
| | | If Y, indicate the exchange traded on and ticker | |
| 6 | a I | | |
| | | symbol | |
| | | | |
| | | | |
| 6 | h | Member Owned/Mutual | |
| 6 | | Government or State Owned by 25% or more | |
| 6 | | Privately Owned | |
| | | | |
| 6 | a1 | If Y, provide details of shareholders or ultimate | |
| | | beneficial owners with a holding of 10% or more | |
| | | | |
| | | | |
| 7 | | % of the Entity's total shares composed of bearer | |
| - | | shares | |
| | | 310103 | |
| | | | |
| | | | |
| 8 | | Does the Entity, or any of its branches, operate under | |
| | | an Offshore Banking License (OBL)? | |
| 8 ; | 9 | If Y, provide the name of the relevant branch/es | |
| - | - | which operate under an OBL | |
| | | | |
| | | | |
| | | | |
| 9 | | Does the Bank have a Virtual Bank License or | |
| | | provide services only through online channels? | |
| 10 |) | Name of primary financial regulator/supervisory | |
| | | authority | |
| | | | |
| | | | |
| | | | |
| 11 | | Provide Legal Entity Identifier (LEI) if available | |
| | | | |
| | | | |
| | | | |
| 4.5 | | | |
| 12 | | Provide the full legal name of the ultimate parent (if | |
| | | different from the Entity completing the DDQ) | |
| | | | |
| | | | |
| | | | |

| 40 | Installed a construction of the second | |
|-----------|---|--|
| 13 | Jurisdiction of licensing authority and regulator of | |
| | ultimate parent | |
| | | |
| | | |
| | | |
| | | |
| 14 | Select the business areas applicable to the Entity | |
| 14 a | Retail Banking | |
| 14 b | Private Banking | |
| | | |
| 14 c | Commercial Banking | |
| 14 d | Transactional Banking | |
| | <u> </u> | |
| 14 e | Investment Banking | |
| 14 f | Financial Markets Trading | |
| | , and the second s | |
| 14 g | Securities Services/Custody | |
| 14 h | Broker/Dealer | |
| 14 i | Multilateral Development Bank | |
| | • | |
| 14 j | Wealth Management | |
| 14 k | Other (please explain) | |
| 14 K | | |
| | | |
| | | |
| | | |
| | | |
| 15 | Does the Entity have a significant (10% or more) | |
| 15 | | |
| | portfolio of non-resident customers or does it derive | |
| | more than 10% of its revenue from non-resident | |
| 1 | customers? (Non-resident means customers primarily | |
| 1 | | |
| | resident in a different jurisdiction to the location | |
| 1 | where bank services are provided) | |
| 1 | . , | |
| 15 a | If Y, provide the top five countries where the non- | |
| 15 4 | | |
| | resident customers are located. | |
| | | |
| | | |
| | | |
| 16 | Select the closest value: | |
| | | |
| 16 a | Number of employees | |
| 16 b | Total Assets | |
| | | |
| 17 | Confirm that all responses provided in the above | |
| | Section are representative of all the LE's branches. | |
| 17 a | If N algorify which guagations the difference (a relate to | |
| 17 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to. | |
| | | |
| | | |
| | | |
| 10 | | |
| 18 | If appropriate, provide any additional | |
| | information/context to the answers in this section. | |
| | | |
| | | |
| | | |
| | | |
| 2. PRODUC | CTS & SERVICES | |
| 19 | Does the Entity offer the following products and | |
| | services: | |
| | | |
| 19 a | Correspondent Banking | |
| 19 a1 | IfY | |
| | | |
| 19 a1a | Does the Entity offer Correspondent Banking | |
| | services to domestic banks? | |
| | | |
| 19 a1b | Does the Entity allow domestic bank clients to | |
| 1 | provide downstream relationships? | |
| 40.4 | | |
| 19 a1c | Does the Entity have processes and procedures | |
| | in place to identify downstream relationships with | |
| | domestic banks? | |
| | | |
| 19 a1d | Does the Entity offer Correspondent Banking | |
| | services to foreign banks? | |
| L | Ĵ | |
| 19 a1e | Does the Entity allow downstream relationships | |
| | with foreign banks? | |
| | <u> </u> | |
| 19 a1f | Does the Entity have processes and procedures | |
| | in place to identify downstream relationships with | |
| | | |
| | foreign banks? | |
| 19 a1g | Does the Entity offer Correspondent Banking | |
| Jany | | |
| 1 | services to regulated Money Services Businesses | |
| 1 | (MSBs)/Money Value Transfer Services (MVTSs)? | |
| 10 - 11 | | |
| 19 a1h | Does the Entity allow downstream relationships | |
| | with MSBs, MVTSs, or Payment Service Provider | |
| | (PSPs)? | |
| | | |
| 19 a1h1 | MSBs | |
| 19 a1h2 | | |
| | MVTSs | |
| 19 a1h3 | PSPs | |

| 19 a1i | Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs? | |
|--|---|--|
| 19 b | Cross-Border Bulk Cash Delivery | |
| 19 c | Cross-Border Remittances | |
| 19 c 19 d | Domestic Bulk Cash Delivery | |
| | | |
| 19 e | Hold Mail | |
| 19 f | International Cash Letter | |
| 19 g | Low Price Securities | |
| 19 h | Payable Through Accounts | |
| 19 i | Payment services to non-bank entities who may | |
| 101 | then offer third party payment services to their customers? | |
| 19 i1 | If Y, please select all that apply below? | |
| 19 i2 | Third Party Payment Service Providers | |
| 19 i3 | Virtual Asset Service Providers (VASPs) | |
| 19 i4 | eCommerce Platforms | |
| - | | |
| 19 i5 | Other - Please explain | |
| 19 j | Private Banking | |
| 19 k | Remote Deposit Capture (RDC) | |
| 19 I | Sponsoring Private ATMs | |
| 19 m | Stored Value Instruments | |
| 19 m | Trade Finance | |
| 19 0 | Virtual Assets | |
| | | |
| 19 p | For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence: | |
| 19 p1 | Check cashing service | |
| 19 p1a | If yes, state the applicable level of due diligence | |
| 19 p2 | Wire transfers | |
| 19 p2a | If yes, state the applicable level of due diligence | |
| 19 p2a 19 p3 | | |
| | Foreign currency conversion | |
| 19 p3a | If yes, state the applicable level of due diligence | |
| 19 p4 | Sale of Monetary Instruments | |
| 19 p4a | If yes, state the applicable level of due diligence | |
| | | |
| 19 p5 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. | |
| | If you offer other services to walk-in customers please provide more detail here, including | |
| 19 p5 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by | |
| 19 p5 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above | |
| 19 p5 19 q 20 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to | |
| 19 p5 19 q 20 20 a 21 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. | |
| 19 p5 19 q 20 20 a 21 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the | |
| 19 p5 19 q 20 20 a 21 3. AML, C1 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum | |
| 19 p5 19 q 20 20 a 21 3. AML, C1 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the | |
| 19 p5 19 q 20 20 a 21 3. AML, C1 22 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise | |
| 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 b | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening | |
| 19 p5 19 p5 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership | |
| 19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 c 22 d | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting | |
| 19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 c 22 c 22 c 22 c 22 c | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD | |
| 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c 22 c 22 c 22 c 22 c 22 c 22 c 22 c | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting | |
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| 19 p5 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c 22 c 22 c 22 c 22 c 22 c 22 d 22 c 22 d 22 c 22 d 22 c | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review | |
| 19 p5 19 p5 19 q 20 20 a 21 22 a 22 a 22 a 22 c 22 c | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures | |
| 19 p5 19 p5 19 q 20 20 a 20 a 21 22 a 22 a 22 b 22 c 22 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening | |
| 19 p5 19 p5 19 q 20 a 20 a 21 a 22 a 22 a 22 b 22 c 22 d 22 c 22 d 22 c 22 d 22 g 22 h 22 i 22 j 22 k | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment | |
| 19 p5 19 p5 19 q 20 20 a 20 a 21 22 a 22 a 22 b 22 c 22 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening | |

| 22 m | Suspicious Activity Reporting | |
|-----------|---|--|
| 22 n | Training and Education | |
| 22 o | Transaction Monitoring | |
| 23 | How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? | |
| 24 | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29. | |
| 25 | Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme? | |
| 26 | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? | |
| 26 a | If Y, provide further details | |
| 27 | Does the entity have a whistleblower policy? | |
| 28 | Confirm that all responses provided in the above Section are representative of all the LE's branches | |
| 28 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 29 | If appropriate, provide any additional information/context to the answers in this section. | |
| 4. ANTI E | RIBERY & CORRUPTION | |
| 30 | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? | |
| 31 | Does the Entity have an enterprise wide programme that sets minimum ABC standards? | |
| 32 | Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? | |
| 33 | Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? | |
| 34 | Is the Entity's ABC programme applicable to: | |
| 35 | Does the Entity have a global ABC policy that: | |
| 35 a | Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage. | |
| 35 b | Includes enhanced requirements regarding interaction with public officials? | |
| 35 c | Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? | |
| 36 | Does the Entity have controls in place to monitor the effectiveness of their ABC programme? | |
| 37 | Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? | |
| 38 | Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? | |
| 38 a | If N, provide the date when the last ABC EWRA was completed. | |
| 39 | Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? | |
| 40 | Does the Entity's ABC EWRA cover the inherent risk components detailed below: | |
| 40 a | Potential liability created by intermediaries and other third-party providers as appropriate | |

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

| 49 i | Define the process for escalating financial crime risk issues/potentially suspicious activity identified by | |
|--|---|--|
| | employees | |
| 49 j | Define the process, where appropriate, for | |
| - | terminating existing customer relationships due to financial crime risk | |
| 49 k | Define the process for exiting clients for financial | |
| | crime reasons that applies across the entity, including foreign branches and affiliates | |
| 49 I | Define the process and controls to identify and | |
| | handle customers that were previously exited for | |
| | financial crime reasons if they seek to re-establish a relationship | |
| 49 m | Outline the processes regarding screening for | |
| | sanctions, PEPs and Adverse Media/Negative News | |
| 49 n | Outline the processes for the maintenance of internal "watchlists" | |
| 50 | Has the Entity defined a risk tolerance statement or | |
| | similar document which defines a risk boundary around their business? | |
| 51 | Does the Entity have record retention procedures that | |
| • | comply with applicable laws? | |
| 51 a | If Y, what is the retention period? | |
| | | |
| | | |
| 52 | Confirm that all means any ideal in the above | |
| 32 | Confirm that all responses provided in the above Section are representative of all the LE's branches | |
| 52 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to. | |
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| | | |
| 53 | If appropriate, provide any additional information/context to the answers in this section. | |
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| 6. AML. CTF | & SANCTIONS RISK ASSESSMENT | |
| 6. AML, CTF 54 | & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the | |
| 54 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: | |
| 54 54 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client | |
| 54 54 a 54 b | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product | |
| 54 a 54 b 54 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel | |
| 54 a 54 b 54 c 54 d | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography | |
| 54 a 54 b 54 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel | |
| 54 a 54 b 54 c 54 d 55 55 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring | |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 b | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence | |
| 54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification | |
| 54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c 55 c 55 d | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening | |
| 54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification | |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education | |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance | |
| 54 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information | |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance | |
| 54 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 d 55 d 55 d 55 d 55 d 55 f 55 g 55 h 56 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? | |
| 54 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed | |
| 54 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 d 55 d 55 d 55 d 55 d 55 f 55 g 55 h 56 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF | |
| 54 54 a 54 b 54 c 55 a 55 a 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the Iast 12 months? If N, provide the date when the Iast AML & CTF EWRA was completed. | |
| 54 54 a 54 b 54 c 55 a 55 a 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent | |
| 54 54 a 54 b 54 c 54 d 55 a 55 a 55 c 55 c 55 d 55 c 55 d 55 c 55 f 55 f 55 h 56 a 57 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: | |
| 54 54 a 54 b 54 c 54 d 55 a 55 a 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client | |
| 54 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 c 57 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product | |
| 54 54 a 54 b 54 c 54 d 55 a 55 a 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel | |
| 54 54 a 54 b 54 c 54 d 55 a 55 a 55 a 55 c 55 c 57 c 57 c 57 c 57 c 57 c 57 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product | |
| 54 54 a 54 b 54 c 54 d 55 55 b 55 c 55 d 55 c 55 d 55 d 55 d 55 f 55 g 55 h 56 57 57 a 57 c 57 d 58 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | |
| 54 54 a 54 b 54 c 55 a 55 b 55 b 55 c 55 c 55 d 55 c 55 d 55 f 55 f 55 h 56 57 57 a 57 d 57 d 58 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | |
| 54 54 a 54 b 54 c 55 a 55 b 55 c 55 c 55 d 55 c 55 d 55 f 55 g 55 h 56 a 57 c 57 d 58 a 58 b | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance | |
| 54 54 a 54 b 54 d 55 a 55 b 55 c 55 d 55 c 55 d 55 f 55 f 55 h 56 57 57 a 57 d 57 d 58 58 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | |

| 59 0 | Name Careening | |
|----------------|---|--|
| 58 e 58 f | Name Screening | |
| 58 f 58 g | Transaction Screening Training and Education | |
| 58 g 59 | Has the Entity's Sanctions EWRA been completed in the last 12 months? | |
| 50 - | | |
| 59 a | If N, provide the date when the last Sanctions EWRA was completed. | |
| 60 | Confirm that all responses provided in the above Section are representative of all the LE's branches | |
| 60 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to. | |
| 61 | If appropriate, provide any additional information/context to the answers in this section. | |
| 7. KYC, C | DD and EDD | |
| 62 | Does the Entity verify the identity of the customer? | |
| 63 | Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days? | |
| 64 | Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: | |
| 64 a | Customer identification | |
| 64 b | Expected activity | |
| 64 c | Nature of business/employment | |
| 64 d | Ownership structure | |
| 64 e | Product usage | |
| 64 f | Purpose and nature of relationship Source of funds | |
| 64 g 64 h | Source of runds Source of wealth | |
| 65 | Are each of the following identified: | |
| 65 a | Ultimate beneficial ownership | |
| 65 a1 | Are ultimate beneficial owners verified? | |
| 65 b | Authorised signatories (where applicable) | |
| 65 c | Key controllers | |
| 65 d | Other relevant parties | |
| 66 | What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? | |
| 67 | Does the due diligence process result in customers receiving a risk classification? | |
| 67 a | If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: | |
| 67 a1 | Product Usage | |
| 67 a2 67 a3 | Geography | |
| 67 a3 67 a4 | Business Type/Industry Legal Entity type | |
| 67 a4 | Adverse Information | |
| 67 a6 | Other (specify) | |
| 68 | For high risk non-individual customers, is a site visit a part of your KYC process? | |
| 68 a | If Y, is this at: | |
| 68 a1 | Onboarding | |
| 68 a2 | KYC renewal | |
| 68 a3 68 a4 | Trigger event Other | |
| 68 a4a | If yes, please specify "Other" | |
| 69 | Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? | |
| 69 a | If Y, is this at: | |
| 69 a1 | Onboarding | |
| 69 a2 | KYC renewal | |

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

| 78 a | If Y indicate who provides the approval: | |
|-----------|---|--|
| 79 | Does the Entity have specific procedures for | |
| | onboarding entities that handle client money such as | |
| | lawyers, accountants, consultants, real estate agents? | |
| 80 | Does the Entity perform an additional control or quality review on clients subject to EDD? | |
| 81 | Confirm that all responses provided in the above Section are representative of all the LE's branches | |
| 81 a | If N, clarify which questions the difference/s relate to | |
| 014 | and the branch/es that this applies to | |
| | | |
| | | |
| 0.0 | | |
| 82 | If appropriate, provide any additional information/context to the answers in this section. | |
| | | |
| | | |
| | | |
| 8. MONITO | DRING & REPORTING | |
| 83 | Does the Entity have risk based policies, procedures | |
| | and monitoring processes for the identification and | |
| | reporting of suspicious activity? | |
| 04 | What is the method used by the Entity to monitor | |
| 84 | transactions for suspicious activities? | |
| | | |
| 84 a | If manual or combination selected, specify what | |
| | type of transactions are monitored manually | |
| | | |
| | | |
| 84 b | If automated or combination selected, are internal system or vendor-sourced tools used? | |
| | system of vendor-sourced tools used : | |
| 84 b1 | If 'Vendor-sourced tool' or 'Both' selected, what is | |
| | the name of the vendor/tool? | |
| | | |
| | | |
| 84 b2 | When was the tool last updated? | |
| 0440 | When weathe automated Transaction Manitaring | |
| 84 b3 | When was the automated Transaction Monitoring application last calibrated? | |
| | | |
| 85 | Does the Entity have regulatory requirements to | |
| | report suspicious transactions? | |
| 85 a | If Y, does the Entity have policies, procedures and | |
| 05 a | processes to comply with suspicious transaction | |
| | reporting requirements? | |
| - | | |
| 86 | Does the Entity have policies, procedures and | |
| | processes to review and escalate matters arising from | |
| | the monitoring of customer transactions and activity? | |
| 87 | Does the Entity have a data quality management | |
| -· | programme to ensure that complete data for all | |
| | transactions are subject to monitoring? | |
| | Deep the Entity have proceeds in place to record | |
| 88 | Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities | |
| | in a timely manner? | |
| | | |
| 89 | Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in | |
| | a timely manner? | |
| 90 | Confirm that all responses provided in the above | |
| | Section are representative of all the LE's branches | |
| 90 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to | |
| | | |
| | | |
| 91 | If appropriate, provide any additional | |
| | information/context to the answers in this section. | |
| | | |
| | | |
| 9. PAYME | NT TRANSPARENCY | |
| 92 | Does the Entity adhere to the Wolfsberg Group | |
| | Payment Transparency Standards? | |

| 93 | Does the Entity have policies, procedures and | |
|----------|--|--|
| 55 | | |
| | processes to comply with and have controls in place | |
| | to ensure compliance with: | |
| 93 a | FATF Recommendation 16 | |
| 93 b | Local Regulations | |
| 93 b1 | If Y, specify the regulation | |
| 55 51 | | |
| 93 c | If N, explain | |
| | | |
| 94 | Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages? | |
| 95 | Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages? | |
| 95 a | If Y, does the Entity have procedures to include beneficiary address including country in cross border payments? | |
| 96 | Confirm that all responses provided in the above Section are representative of all the LE's branches | |
| 96 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 97 | If appropriate, provide any additional information/context to the answers in this section. | |
| 10. SANC | TIONS | |
| 98 | Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? | |
| 99 | Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)? | |
| 100 | Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? | |
| 101 | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? | |
| 102 | What is the method used by the Entity for sanctions screening? | |
| 102 a | If 'automated' or 'both automated and manual' selected: | |
| 102 a1 | Are internal system of vendor-sourced tools used? | |
| 102 a1a | If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? | |
| 102 a2 | When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110) | |
| 103 | Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? | |
| 104 | What is the method used by the Entity? | |

| 105 | - | |
|--|---|--|
| | Does the Entity have a data quality management | |
| | programme to ensure that complete data for all | |
| | transactions are subject to sanctions screening? | |
| | | |
| 106 | Select the Sanctions Lists used by the Entity in its | |
| | sanctions screening processes: | |
| 106 a | Consolidated United Nations Security Council | |
| 100 u | Sanctions List (UN) | |
| | . , | |
| 106 b | United States Department of the Treasury's Office of | |
| | Foreign Assets Control (OFAC) | |
| 106 c | Office of Financial Sanctions Implementation HMT | |
| | (OFSI) | |
| | | |
| 106 d | European Union Consolidated List (EU) | |
| 106 e | Lists maintained by other G7 member countries | |
| 106 f | Other (specify) | |
| | | |
| | | |
| | | |
| | | |
| 107 | When regulatory authorities make updates to their | |
| 101 | Sanctions list, how many business days before the | |
| | | |
| | entity updates their active manual and/or automated | |
| | screening systems against: | |
| 107 a | Customer Data | |
| 107 b | Transactions | |
| 107 5 | | |
| 100 | Does the Entity have a physical presence, e.g. | |
| | branches, subsidiaries, or representative offices | |
| | located in countries/regions against which UN, OFAC, | |
| | OFSI, EU or G7 member countries have enacted | |
| | comprehensive jurisdiction-based Sanctions? | |
| 109 | Confirm that all responses provided in the above | |
| | Section are representative of all the LE's branches | |
| 100 - | | |
| 109 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to. | |
| | | |
| | | |
| 110 | lf annuanista mussida anu additional | |
| 110 | If appropriate, provide any additional | |
| | information/context to the answers in this section. | |
| | | |
| | | |
| | | |
| | G & EDUCATION | |
| 111 | Does the Entity provide mandatory training, which | |
| | includes: | |
| | | |
| 111 a | Identification and reporting of transactions to | |
| 111 a | | |
| | Identification and reporting of transactions to government authorities | |
| 111 a 111 b | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, | |
| | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant | |
| | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, | |
| 111 b | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered | |
| 111 b | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant | |
| 111 b | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered | |
| 111 b 111 c | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations | |
| 111 b | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant | |
| 111 b 111 c 111 d | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations | |
| 111 b 111 c 111 d 111 e | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture | |
| 111 b 111 c 111 d 111 e 111 f | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud | |
| 111 b 111 c 111 d 111 e | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture | |
| 111 b 111 c 111 d 111 e 111 f | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud | |
| 111 b 111 c 111 d 111 e 111 f 112 112 a | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management | |
| 111 b 111 c 111 d 111 e 111 f 112 112 a 112 b | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence | |
| 111 b 111 c 111 d 111 e 111 f 112 112 a 112 b 112 c | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence | |
| 111 b 111 c 111 d 111 e 111 f 112 112 a 112 b 112 c 112 d | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence | |
| 111 b 111 c 111 d 111 e 111 f 112 112 a 112 b 112 c | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence Third parties to which specific FCC activities have | |
| 111 b 111 c 111 d 111 e 111 f 112 112 a 112 b 112 c 112 d | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence | |
| 111 b 111 c 111 d 111 e 111 f 112 a 112 a 112 b 112 c 112 d 112 e | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence Third parties to which specific FCC activities have been outsourced | |
| 111 b 111 c 111 d 111 e 111 f 112 a 112 b 112 c 112 d 112 e 112 f | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) | |
| 111 b 111 c 111 d 111 e 111 f 112 a 112 a 112 b 112 c 112 d 112 e | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training | |
| 111 b 111 c 111 d 111 e 111 f 112 a 112 b 112 c 112 d 112 e 112 f | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and | |
| 1111 b 1111 c 1111 c 1111 d 1112 112 a 112 b 112 c 112 d 112 c 112 d 112 c 112 f 113 | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities? | |
| 111 b 111 c 111 d 111 e 111 f 112 a 112 b 112 c 112 d 112 e 112 f | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities? Does the Entity provide customised training for AML, | |
| 1111 b 1111 c 1111 c 1111 d 1112 112 a 112 b 112 c 112 d 112 c 112 d 112 c 112 f 113 | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities? | |
| 1111 b 1111 c 1111 c 1111 d 1112 112 a 112 b 112 c 112 d 112 c 112 d 112 c 112 f 113 | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities? Does the Entity provide customised training for AML, | |
| 111 b 111 c 111 c 111 d 111 e 111 f 112 a 112 b 112 c 112 d 112 c 112 d 112 c 112 f 113 114 | Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities? Does the Entity provide customised training for AML, CTF and Sanctions staff? | |

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

| 129 | Does the Entity have real time monitoring to detect fraud? | | |
|-----------------------------------|---|---|--|
| 130 | Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID? | | |
| 131 | Confirm that all responses provided in the above section are representative of all the LE's branches | | |
| 131 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | | |
| 132 | If appropriate, provide any additional information/context to the answers in this section. | | |
| Declaratio | on Statement | | |
| Declaration S | oup Correspondent Banking Due Diligence Questionnaire 2023 (CE Statement (To be signed by Global Head of Correspondent Bank Laundering, Chief Compliance Officer, Global Head of Financial | ing or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of | |
| every effort t | | on name) is fully committed to the fight against financial crime and makes s, regulations and standards in all of the jurisdictions in which it does business and holds accounts. | |
| | I Institution understands the critical importance of having effectivulatory obligations. | re and sustainable controls to combat financial crime in order to protect its reputation and to meet its | |
| The Financia standards. | I Institution recognises the importance of transparency regardin | g parties to transactions in international payments and has adopted/is committed to adopting these | |
| | I Institution further certifies it complies with / is working to compl ion provided in this Wolfsberg CBDDQ will be kept current and w | y with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. vill be updated no less frequently than every eighteen months. | |
| The Financia | I Institution commits to file accurate supplemental information on | a timely basis. | |
| I, the answers Institution. | I, (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution. | | |
| I, Wolfsberg CI | | valent), certify that I have read and understood this declaration, that the answers provided in this im authorised to execute this declaration on behalf of the Financial Institution. | |
| | (Signature & Dat | e) | |
| đ, | (Signature & Dat | e) | |

the Wolfsberg Group

Financial Institution Name: Location (Country) :

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

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

| 19 a1i | Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs? | |
|--|---|--|
| 19 b | Cross-Border Bulk Cash Delivery | |
| 19 c | Cross-Border Remittances | |
| | Domestic Bulk Cash Delivery | |
| 19 d | | |
| 19 e | Hold Mail | |
| 19 f | International Cash Letter | |
| 19 g | Low Price Securities | |
| 19 h | Payable Through Accounts | |
| 19 i | Payment services to non-bank entities who may | |
| | then offer third party payment services to their customers? | |
| 19 i1 | If Y, please select all that apply below? | |
| 19 i2 | Third Party Payment Service Providers | |
| 19 i3 | Virtual Asset Service Providers (VASPs) | |
| 19 i4 | eCommerce Platforms | |
| 19 i5 | Other - Please explain | |
| | | |
| 19 j | Private Banking | |
| 19 k | Remote Deposit Capture (RDC) | |
| 191 | Sponsoring Private ATMs | |
| 19 m | Stored Value Instruments | |
| 19 n | Trade Finance | |
| 19 o | Virtual Assets | |
| 19 p | For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence: | |
| 19 p1 | Check cashing service | |
| | If yes, state the applicable level of due diligence | |
| 19 p1a | Wire transfers | |
| 19 p2 | | |
| 19 p2a | If yes, state the applicable level of due diligence | |
| 19 p3 | Foreign currency conversion | |
| 19 p3a | If yoo atota the applicable level of due diligence | |
| | If yes, state the applicable level of due diligence | |
| 19 p4 | Sale of Monetary Instruments | |
| 19 p4 19 p4a | Sale of Monetary Instruments If yes, state the applicable level of due diligence | |
| 19 p4 | Sale of Monetary Instruments | |
| 19 p4 19 p4a | Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including | |
| 19 p4 19 p4a 19 p5 | Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by | |
| <u>19 p4</u> <u>19 p4a</u> <u>19 p5</u> <u>19 q</u> | Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above | |
| <u>19 p4</u> <u>19 p4a</u> <u>19 p5</u> <u>19 q</u> <u>20</u> | Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to | |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 | Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. | |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 | Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the | |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C1 | Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum | |
| <u>19 p4</u> <u>19 p4a</u> <u>19 p5</u> <u>19 q</u> <u>20 a</u> <u>20 a</u> <u>21 3. AML, CT</u> <u>22</u> | Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: | |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a | Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise | |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 b | Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise | |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c | Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. FE & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership | |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c 22 d | Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting | |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c 22 d 22 c 22 d 22 c 22 d 22 c 22 d 22 e | Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD | |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c 22 d | Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting | |
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| 19 p4 19 p4a 19 p5 19 p5 20 20 a 20 a 21 3. AML, CT 22 a 22 b 22 c 22 b 22 c 22 d 22 e 22 f 22 g | Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing | |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT 22 a 22 b 22 c 22 d 22 e 22 g 22 h | Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review | |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 20 a 21 3. AML, CT 22 a 22 b 22 c 22 d 22 e 22 g 22 h 22 i | Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures | |
| 19 p4 19 p4a 19 p5 19 p5 20 20 a 20 a 20 a 22 a 22 b 22 c 22 d 22 e 22 g 22 g 22 h 22 i 22 j | Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review Policies and Procedures PEP Screening | |
| 19 p4 19 p4a 19 p5 19 p5 20 20 a 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 k | Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment | |
| 19 p4 19 p4a 19 p5 19 p5 20 20 a 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 z 22 d 22 g 22 i 22 z 22 j | Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review Policies and Procedures PEP Screening | |

| 22 m | Suspicious Activity Reporting | |
|-----------|---|--|
| 22 n | Training and Education | |
| 22 o | Transaction Monitoring | |
| 23 | How many full time employees are in the Entity's | |
| | AML, CTF & Sanctions Compliance Department? | |
| 24 | Is the Entity's AML, CTF & Sanctions policy approved | |
| | at least annually by the Board or equivalent Senior | |
| | Management Committee? If N, describe your practice | |
| | in Question 29. | |
| 25 | Does the Board receive, assess, and challenge | |
| | regular reporting on the status of the AML, CTF, & | |
| | Sanctions programme? | |
| 26 | Does the Entity use third parties to carry out any | |
| 20 | components of its AML, CTF & Sanctions programme? | |
| 26 a | | |
| 20 a | If Y, provide further details | |
| | | |
| | | |
| | | |
| 27 | Does the entity have a whistleblower policy? | |
| 28 | Confirm that all responses provided in the above | |
| | Section are representative of all the LE's branches | |
| 28 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to. | |
| | | |
| | | |
| 29 | If appropriate, provide any additional | |
| | information/context to the answers in this section. | |
| | | |
| | | |
| 4. ANTI B | RIBERY & CORRUPTION | |
| 30 | Has the Entity documented policies and procedures | |
| | consistent with applicable ABC regulations and | |
| | requirements to reasonably prevent, detect and | |
| | report bribery and corruption? | |
| 31 | Does the Entity have an enterprise wide programme | |
| | that sets minimum ABC standards? | |
| 32 | Has the Entity appointed a designated officer or | |
| | officers with sufficient experience/expertise | |
| | responsible for coordinating the ABC programme? | |
| 33 | Does the Entity have adequate staff with appropriate | |
| | levels of experience/expertise to implement the ABC | |
| | programme? | |
| 34 | Is the Entity's ABC programme applicable to: | |
| 35 | Does the Entity have a global ABC policy that: | |
| 35 a | Prohibits the giving and receiving of bribes? This | |
| | includes promising, offering, giving, solicitation or | |
| | receiving of anything of value, directly or indirectly, | |
| | if improperly intended to influence action or obtain | |
| | an advantage. | |
| 35 b | Includes enhanced requirements regarding | |
| | interaction with public officials? | |
| 35 c | Includes a prohibition against the falsification of | |
| | books and records (this may be within the ABC policy | |
| | or any other policy applicable to the Legal Entity)? | |
| 36 | Does the Entity have controls in place to monitor the | |
| | effectiveness of their ABC programme? | |
| 37 | Does the Board receive, assess, and challenge regular | |
| | reporting on the status of the ABC programme? | |
| 38 | Has the Entity's ABC Enterprise Wide Risk Assessment | |
| | (EWRA) been completed in the last 12 months? | |
| 38 a | If N. provide the date when the last ABC EWRA was | |
| 00 0 | completed. | |
| | | |
| | | |
| 20 | Doos the Entity have an APC residual risk ration that | |
| 39 | Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the | |
| | inherent risk assessment? | |
| 40 | | |
| 40 | Does the Entity's ABC EWRA cover the inherent risk | |
| 40.0 | components detailed below: | |
| 40 a | Potential liability created by intermediaries and | |
| | other third-party providers as appropriate | |

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

| 49 i | Define the process for escalating financial crime risk issues/potentially suspicious activity identified by | |
|--|---|--|
| | employees | |
| 49 j | Define the process, where appropriate, for | |
| - | terminating existing customer relationships due to financial crime risk | |
| 49 k | Define the process for exiting clients for financial | |
| | crime reasons that applies across the entity, including foreign branches and affiliates | |
| 49 I | Define the process and controls to identify and | |
| | handle customers that were previously exited for | |
| | financial crime reasons if they seek to re-establish a relationship | |
| 49 m | Outline the processes regarding screening for | |
| | sanctions, PEPs and Adverse Media/Negative News | |
| 49 n | Outline the processes for the maintenance of internal "watchlists" | |
| 50 | Has the Entity defined a risk tolerance statement or | |
| | similar document which defines a risk boundary around their business? | |
| 51 | Does the Entity have record retention procedures that | |
| • | comply with applicable laws? | |
| 51 a | If Y, what is the retention period? | |
| | | |
| | | |
| 52 | Confirm that all means any ideal in the above | |
| 32 | Confirm that all responses provided in the above Section are representative of all the LE's branches | |
| 52 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to. | |
| | | |
| | | |
| 53 | If appropriate, provide any additional information/context to the answers in this section. | |
| | | |
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| | | |
| 6. AML. CTF | & SANCTIONS RISK ASSESSMENT | |
| 6. AML, CTF 54 | & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the | |
| 54 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: | |
| 54 54 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client | |
| 54 54 a 54 b | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product | |
| 54 a 54 b 54 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel | |
| 54 a 54 b 54 c 54 d | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography | |
| 54 a 54 b 54 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel | |
| 54 a 54 b 54 c 54 d 55 55 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring | |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 b | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence | |
| 54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification | |
| 54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c 55 c 55 d | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening | |
| 54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification | |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education | |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance | |
| 54 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information | |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance | |
| 54 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 d 55 d 55 d 55 d 55 d 55 f 55 g 55 h 56 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? | |
| 54 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed | |
| 54 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 d 55 d 55 d 55 d 55 d 55 f 55 g 55 h 56 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF | |
| 54 54 a 54 b 54 c 55 a 55 a 55 b 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the Iast 12 months? If N, provide the date when the Iast AML & CTF EWRA was completed. | |
| 54 54 a 54 b 54 c 55 a 55 a 55 b 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent | |
| 54 54 a 54 b 54 c 54 d 55 a 55 a 55 c 55 c 55 d 55 c 55 d 55 c 55 f 55 f 55 h 56 a 57 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: | |
| 54 54 a 54 b 54 c 54 d 55 a 55 a 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client | |
| 54 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 c 57 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product | |
| 54 54 a 54 b 54 c 54 d 55 a 55 a 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel | |
| 54 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 c 57 c 57 c 57 c 57 c 57 c 57 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product | |
| 54 54 a 54 b 54 c 54 d 55 55 b 55 c 55 d 55 c 55 d 55 d 55 d 55 f 55 g 55 h 56 57 57 a 57 c 57 d 58 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | |
| 54 54 a 54 b 54 c 55 a 55 b 55 b 55 c 55 c 55 d 55 c 55 d 55 f 55 f 55 h 56 57 57 a 57 d 57 d 58 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | |
| 54 54 a 54 b 54 c 55 a 55 b 55 c 55 d 55 c 55 d 55 f 55 g 55 h 56 a 57 c 57 d 58 a 58 b | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | |
| 54 54 a 54 b 54 d 55 a 55 b 55 c 55 d 55 c 55 d 55 f 55 f 55 h 56 57 57 a 57 d 57 d 58 58 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | |

| 58 e | Name Careening | |
|----------------|---|--|
| 58 f | Name Screening | |
| 58 f 58 g | Transaction Screening Training and Education | |
| 58 g 59 | Has the Entity's Sanctions EWRA been completed in the last 12 months? | |
| 50 - | | |
| 59 a | If N, provide the date when the last Sanctions EWRA was completed. | |
| 60 | Confirm that all responses provided in the above Section are representative of all the LE's branches | |
| 60 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to. | |
| 61 | If appropriate, provide any additional information/context to the answers in this section. | |
| 7. KYC, C | DD and EDD | |
| 62 | Does the Entity verify the identity of the customer? | |
| 63 | Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days? | |
| 64 | Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: | |
| 64 a | Customer identification | |
| 64 b | Expected activity | |
| 64 c | Nature of business/employment | |
| 64 d | Ownership structure | |
| 64 e | Product usage | |
| 64 f | Purpose and nature of relationship Source of funds | |
| 64 g 64 h | Source of runds Source of wealth | |
| 65 | Are each of the following identified: | |
| 65 a | Ultimate beneficial ownership | |
| 65 a1 | Are ultimate beneficial owners verified? | |
| 65 b | Authorised signatories (where applicable) | |
| 65 c | Key controllers | |
| 65 d | Other relevant parties | |
| 66 | What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? | |
| 67 | Does the due diligence process result in customers receiving a risk classification? | |
| 67 a | If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: | |
| 67 a1 | Product Usage | |
| 67 a2 67 a3 | Geography | |
| 67 a3 67 a4 | Business Type/Industry Legal Entity type | |
| 67 a4 | Adverse Information | |
| 67 a6 | Other (specify) | |
| 68 | For high risk non-individual customers, is a site visit a part of your KYC process? | |
| 68 a | If Y, is this at: | |
| 68 a1 | Onboarding | |
| 68 a2 | KYC renewal | |
| 68 a3 68 a4 | Trigger event Other | |
| 68 a4a | If yes, please specify "Other" | |
| 69 | Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? | |
| 69 a | If Y, is this at: | |
| 69 a1 | Onboarding | |
| 69 a2 | KYC renewal | |

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

| 78 a | If Y indicate who provides the approval: | |
|-----------|---|--|
| 79 | Does the Entity have specific procedures for | |
| | onboarding entities that handle client money such as | |
| | lawyers, accountants, consultants, real estate agents? | |
| 80 | Does the Entity perform an additional control or quality review on clients subject to EDD? | |
| 81 | Confirm that all responses provided in the above Section are representative of all the LE's branches | |
| 81 a | If N, clarify which questions the difference/s relate to | |
| 01 a | and the branch/es that this applies to | |
| | | |
| | | |
| 0.0 | | |
| 82 | If appropriate, provide any additional information/context to the answers in this section. | |
| | | |
| | | |
| | | |
| 8. MONITO | DRING & REPORTING | |
| 83 | Does the Entity have risk based policies, procedures | |
| | and monitoring processes for the identification and | |
| | reporting of suspicious activity? | |
| 04 | What is the method used by the Entity to monitor | |
| 84 | transactions for suspicious activities? | |
| <u> </u> | | |
| 84 a | If manual or combination selected, specify what | |
| | type of transactions are monitored manually | |
| | | |
| | | |
| 84 b | If automated or combination selected, are internal system or vendor-sourced tools used? | |
| | | |
| 84 b1 | If 'Vendor-sourced tool' or 'Both' selected, what is | |
| | the name of the vendor/tool? | |
| | | |
| | | |
| 84 b2 | When was the tool last updated? | |
| 04 62 | When was the outemated Transaction Manitaring | |
| 84 b3 | When was the automated Transaction Monitoring application last calibrated? | |
| | | |
| 85 | Does the Entity have regulatory requirements to | |
| | report suspicious transactions? | |
| 85 a | If Y, does the Entity have policies, procedures and | |
| 05 a | processes to comply with suspicious transaction | |
| | reporting requirements? | |
| - | | |
| 86 | Does the Entity have policies, procedures and | |
| | processes to review and escalate matters arising from | |
| | the monitoring of customer transactions and activity? | |
| 87 | Does the Entity have a data quality management | |
| -· | programme to ensure that complete data for all | |
| | transactions are subject to monitoring? | |
| | Deep the Entity have processes in place to reason it | |
| 88 | Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities | |
| | in a timely manner? | |
| | | |
| 89 | Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in | |
| | a timely manner? | |
| 90 | Confirm that all responses provided in the above | |
| | Section are representative of all the LE's branches | |
| 90 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to | |
| | | |
| | | |
| 91 | If appropriate, provide any additional | |
| | information/context to the answers in this section. | |
| | | |
| | | |
| 9. PAYME | NT TRANSPARENCY | |
| 92 | Does the Entity adhere to the Wolfsberg Group | |
| 1 | Payment Transparency Standards? | |

| 93 | Does the Entity have policies, procedures and | |
|----------|--|--|
| 55 | | |
| | processes to comply with and have controls in place | |
| | to ensure compliance with: | |
| 93 a | FATF Recommendation 16 | |
| 93 b | Local Regulations | |
| 93 b1 | If Y, specify the regulation | |
| 55 51 | | |
| 93 c | If N, explain | |
| | | |
| 94 | Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages? | |
| 95 | Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages? | |
| 95 a | If Y, does the Entity have procedures to include beneficiary address including country in cross border payments? | |
| 96 | Confirm that all responses provided in the above Section are representative of all the LE's branches | |
| 96 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 97 | If appropriate, provide any additional information/context to the answers in this section. | |
| 10. SANC | TIONS | |
| 98 | Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? | |
| 99 | Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)? | |
| 100 | Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? | |
| 101 | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? | |
| 102 | What is the method used by the Entity for sanctions screening? | |
| 102 a | If 'automated' or 'both automated and manual' selected: | |
| 102 a1 | Are internal system of vendor-sourced tools used? | |
| 102 a1a | If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? | |
| 102 a2 | When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110) | |
| 103 | Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? | |
| 104 | What is the method used by the Entity? | |

| | - | |
|-------|--|--|
| 105 | Does the Entity have a data quality management | |
| | programme to ensure that complete data for all | |
| | transactions are subject to sanctions screening? | |
| | | |
| 106 | Select the Sanctions Lists used by the Entity in its | |
| | sanctions screening processes: | |
| 106 a | Consolidated United Nations Security Council | |
| 100 u | Sanctions List (UN) | |
| | | |
| 106 b | United States Department of the Treasury's Office of | |
| | Foreign Assets Control (OFAC) | |
| 106 c | Office of Financial Sanctions Implementation HMT | |
| | (OFSI) | |
| | | |
| 106 d | European Union Consolidated List (EU) | |
| 106 e | Lists maintained by other G7 member countries | |
| 106 f | Other (specify) | |
| | (| |
| | | |
| | | |
| | | |
| 107 | When regulatory authorities make updates to their | |
| 101 | Sanctions list, how many business days before the | |
| | | |
| | entity updates their active manual and/or automated | |
| | screening systems against: | |
| 107 a | Customer Data | |
| 107 b | Transactions | |
| 107 5 | | |
| 100 | Does the Entity have a physical presence, e.g. | |
| | branches, subsidiaries, or representative offices | |
| | located in countries/regions against which UN, OFAC, | |
| | OFSI, EU or G7 member countries have enacted | |
| | comprehensive jurisdiction-based Sanctions? | |
| 109 | Confirm that all responses provided in the above | |
| 100 | Section are representative of all the LE's branches | |
| 100 | | |
| 109 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to. | |
| | | |
| | | |
| 110 | lf annun viete, mussiale en verdeltienel | |
| 110 | If appropriate, provide any additional | |
| | information/context to the answers in this section. | |
| | | |
| | | |
| | | |
| | G & EDUCATION | |
| 111 | Does the Entity provide mandatory training, which | |
| | includes: | |
| 111 a | Identification and reporting of transactions to | |
| | government authorities | |
| 111 b | Examples of different forms of money laundering, | |
| | terrorist financing and sanctions violations relevant | |
| | for the types of products and services offered | |
| | for the types of products and services offered | |
| | | |
| 111 c | Internal policies for controlling money laundering, | |
| | terrorist financing and sanctions violations | |
| 111 d | New issues that occur in the market, e.g. significant | |
| | regulatory actions or new regulations | |
| | | |
| 111 e | Conduct and Culture | |
| 111 f | Fraud | |
| 112 | Is the above mandatory training provided to: | |
| 112 a | Board and Senior Committee Management | |
| 112 b | 1st Line of Defence | |
| | 2nd Line of Defence | |
| 112 c | | |
| 112 d | 3rd Line of Defence | |
| 112 e | Third parties to which specific FCC activities have | |
| | been outsourced | |
| 112 f | Non-employed workers (contractors/consultants) | |
| 1121 | | |
| 113 | Does the Entity provide AML, CTF & Sanctions training | |
| | that is targeted to specific roles, responsibilities and | |
| | high-risk products, services and activities? | |
| 114 | Does the Entity provide customised training for AML, | |
| | CTF and Sanctions staff? | |
| 114 a | If Y, how frequently is training delivered? | |
| 115 | Confirm that all responses provided in the above | |
| | Section are representative of all the LE's branches | |
| | | |

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

| 129 | Does the Entity have real time monitoring to detect | | |
|-----------------------------|---|---|--|
| 130 | fraud? Do the Entity's processes include gathering | | |
| 150 | additional information to support its fraud controls, for | | |
| | example: IP address, GPS location, and/or device ID? | | |
| 131 | Confirm that all responses provided in the above section are representative of all the LE's branches | | |
| 131 a | If N, clarify which questions the difference/s relate to | | |
| | and the branch/es that this applies to. | | |
| | | | |
| 132 | If appropriate, provide any additional | | |
| | information/context to the answers in this section. | | |
| | | | |
| | | | |
| | | | |
| Declarat | ion Statement | | |
| Wolfsberg G | roup Correspondent Banking Due Diligence Questionnaire 2023 (CE | DDQ V1.4) | |
| | Statement (To be signed by Global Head of Correspondent Bank Laundering, Chief Compliance Officer, Global Head of Financial | ing or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of | |
| Anti- Money | | | |
| | (Financial Instituti | on name) is fully committed to the fight against financial crime and makes | |
| every effort | | s, regulations and standards in all of the jurisdictions in which it does business and holds accounts. | |
| | al Institution understands the critical importance of having effectivi gulatory obligations. | re and sustainable controls to combat financial crime in order to protect its reputation and to meet its | |
| The Financi standards. | al Institution recognises the importance of transparency regardin | g parties to transactions in international payments and has adopted/is committed to adopting these | |
| | al Institution further certifies it complies with / is working to compl tion provided in this Wolfsberg CBDDQ will be kept current and v | y with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. vill be updated no less frequently than every eighteen months. | |
| The Financi | al Institution commits to file accurate supplemental information on | a timely basis. | |
| | | | |
| I, | | f Correspondent Banking or equivalent), certify that I have read and understood this declaration, that | |
| the answers Institution. | he answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial | | |
| | | | |
| Wolfsberg C | | valent), certify that I have read and understood this declaration, that the answers provided in this im authorised to execute this declaration on behalf of the Financial Institution. | |
| | Phan Could | | |
| | (Signature & Dat | e) | |
| | | | |
| | (Signature & Dat | e) | |
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the Wolfsberg Group

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Financial Institution Name: BANCO BILBAO VIZCAYA ARGENTARIA, S.A. Location (Country) : HONG KONG

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

| No# | Question | Answer |
|-----------|---|--|
| 1. ENTITY | & OWNERSHIP | |
| 1 | Full Legal Name | |
| 2 | Append a list of foreign branches which are covered by this questionnaire | Hong Kong |
| 3 | Full Legal (Registered) Address | Unit 9507, Level 95, International Commerce Centre, One Austin Road West, Kowloon, Hong Kong |
| 4 | Full Primary Business Address (if different from above) | |
| 5 | Date of Entity incorporation/establishment | The Hong Kong Branch (under the former name of Banco Exterior de Espana, S.A.) was established in 1985. After several mergers with some Spanish banks thereafter, the name was changed to Banco Bilbao Vizcaya Argentaria, S.A. in 2000. |
| 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 | Hong Kong Monetary 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 seculates of | |
|---|--|---|
| 1 | 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 | |
| 14 f | Financial Markets Trading | Please select |
| 14 g | Securities Services/Custody | Please select |
| 14 h | Broker/Dealer | Please select |
| 141 | Multilateral Development Bank | Please select |
| 14 j | Wealth Management | Please select |
| 14 k | Other (please explain) | No |
| 14.6 | | |
| 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. | Australia, Taiwan, U.S.A., Netherlands, South Korea |
| 16 | Select the closest value: | |
| 16 a | | |
| 16 b | Number of employees | 51-200 |
| DIA CONTRACTOR | Total Assets | Please select |
| 17 | Confirm that all responses provided in the above | Please select |
| | Section are representative of all the LE's branches. | |
| 17 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 18 | If appropriate, provide any additional | |
| | information/context to the answers in this section. | |
| 2. PRODI | UCTS & SERVICES | |
| 9 | Does the Entity offer the following products and | |
| | | |
| | services: | |
| | services: | |
| 9 a | services: Correspondent Banking | Please select |
| 9 a 9 a1 | services: Correspondent Banking If Y | Please select |
| 9 a 9 a1 9 a1a | services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? | Please select No |
| 9 a 9 a1 9 a1a 9 a1b | services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? | |
| 9 a 9 a1 9 a1a 9 a1b | services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to | No |
| 9 a 9 a1 9 a1a 9 a1b 9 a1c 9 a1c 9 a1d | services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? | No |
| 9 a 9 a1 9 a1a 9 a1b 9 a1c | services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking | No No No |
| 9 a 9 a1 9 a1a 9 a1b 9 a1c 9 a1c 9 a1d 9 a1e | services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to Identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships | No No Please select |
| 9 a 9 a1 9 a1a 9 a1b 9 a1c 9 a1c 9 a1c 9 a1d 9 a1e 9 a1f | services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with | No No No Please select Please select |
| 9 a 9 a1 9 a1a 9 a1b 9 a1c 9 a1c 9 a1c 9 a1c 9 a1c 9 a1c 9 a1c 9 a1d 9 a1a 9 a1a | services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity fave processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity fave processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses | No No No Please select Please select Please select |
| 9 a 9 a1 9 a1 9 a1a 9 a1b 9 a1c 9 a1c 9 a1c 9 a1c 9 a1c 9 a1c 9 a1c 9 a1c 9 a1c 9 a1c | services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? | No No No Please select Please select No |
| 9 a 9 a1 9 a1a 9 a1b 9 a1c 9 a1c 9 a1d | services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? MSBs | No No No Please select Please select Please select |

| 19 a1i | Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs? | Νο |
|--------|---|---|
| 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 |
| 191 | Payment services to non-bank entities who may | |
| | then offer third party payment services to their customers? | No |
| 19 i1 | If Y, please select all that apply below? | |
| 19 i2 | Third Party Payment Service Providers | No |
| 19 13 | Virtual Asset Service Providers (VASPs) | No |
| 19 14 | eCommerce Platforms | No |
| 19 i5 | Other - Please explain | |
| 19 j | Private Banking | No |
| 19 k | Remote Deposit Capture (RDC) | Please select |
| 191 | Sponsoring Private ATMs | Please select |
| 19 m | Stored Value Instruments | No |
| 19 n | Trade Finance | Please select |
| 19 0 | Virtual Assets | Please select |
| 19 p | For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence: | |
| 19 p1 | Check cashing service | No |
| 19 p1a | If yes, state the applicable level of due diligence | Please select |
| 19 p2 | Wire transfers | No |
| 19 p2a | If yes, state the applicable level of due diligence | Please select |
| 19 p3 | Foreign currency conversion | No |
| 19 p3a | If yes, state the applicable level of due diligence | Please select |
| 19 p4 | Sale of Monetary Instruments | No |
| 19 p4a | If yes, state the applicable level of due diligence | Please select |
| 19 p5 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. | Not applicable |
| 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. | Q19 a1d - BBVA Hong Kong provides correspondent banking services only to BBVA Head Office, a few branches and subsidiary banks mainly in HKD and RMB currencies. |
| | 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 |
| 221 | Policies and Procedures | Please select |
| 22 j | PEP Screening | Please select |
| 22 k | Risk Assessment | Please select |
| 221 | Sanctions | Please select |
| | oundiona | |

| 22 m | Suspicious Activity Reporting | Please select |
|------------|---|---------------|
| 22 m | Training and Education | Please select |
| 22 0 | Transaction Monitoring | Please select |
| 23 | How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? | 1-10 |
| 24 | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29. | Please select |
| 25 | Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme? | Please select |
| 26 | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? | Please select |
| 26 a | If Y, provide further details | |
| 27 | Does the entity have a whistleblower policy? | Please select |
| 28 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 28 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 29 | If appropriate, provide any additional information/context to the answers in this section. | |
| 4. ANTI | BRIBERY & CORRUPTION | |
| 30 | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and | Please select |
| 31 | report bribery and corruption? Does the Entity have an enterprise wide programme | |
| 223) | 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 35 a | Does the Entity have a global ABC policy that: 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. | |
| 5. AML. 0 | CTF & SANCTIONS POLICIES & PROCEDURES | |
| 46 | | |
| | Has the Entity documented policies and procedures | |
| | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: | |
| 46 a | consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, | Please select |
| 46 a 46 b | consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: | Please select Please select |
| | consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering | |
| 46 b | consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing | Please select |
| 46 b 46 c | consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at | Please select Please select |
| 46 b 46 c 47 | consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and | Please select Please select |
| 46 b 46 c 47 48 | consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: | Please select Please select Please select |
| 46 b 46 c 47 48 48 a | consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards | Please select Please select Please select Please select |
| 46 b 46 c 47 48 48 48 a 48 a | consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? | Please select |
| 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 a 48 b | consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: | Please select |
| 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 48 b | consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? | Please select |
| 46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b 48 b 49 | consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous | Please select |
| 46 b 46 c 47 48 48 48 a 48 a 48 b 48 b 48 b 48 b 49 49 a | consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for | Please select |
| 46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b 48 b 48 b 49 49 a 49 b | consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs | Please select |
| 46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b 48 b 49 49 a 49 a 49 b 49 c | consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks | Please select |
| 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 48 b 49 b 49 a 49 b 49 c 49 d | consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides | Please select |
| 46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b 49 b 49 a 49 b 49 c 49 c 49 c 49 c | consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing and keeping of accounts for | Please select Please select |

| | Define the process for escalating financial crime risk | |
|--|---|---|
| 491 | issues/potentially suspicious activity identified by employees | Please select |
| 49 j | Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk | Please select |
| 49 k | Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates | Please select |
| 491 | Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship | Please select |
| 49 m | Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News | Please select |
| 49 n | Outline the processes for the maintenance of internal "watchlists" | Please select |
| 50 | Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business? | Please select |
| 51 | Does the Entity have record retention procedures that comply with applicable laws? | Please select |
| 51 a | If Y, what is the retention period? | Please select |
| 52 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 52 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 53 | If appropriate, provide any additional information/context to the answers in this section. | |
| | | |
| C ANU () | TE & CANATIONS DISK ASSESSMENT | |
| 6. AML, C 54 | TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: | |
| | Does the Entity's AML & CTF EWRA cover the | Please select |
| 54 54 a 54 b | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product | Please select Please select |
| 54 54 a 54 b 54 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel | Please select Please select |
| 54 54 a 54 b | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product | Please select |
| 54 a 54 b 54 c 54 d | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the | Please select Please select |
| 54 a 54 b 54 c 54 d 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: | Please select Please select Please select |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 b 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification | Please select |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 d | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening | Please select Please select Please select Please select Please select |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News | Please select |
| 54 54 a 54 b 54 c 55 d 55 a 55 a 55 a 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education | Please select |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance | Please select |
| 54 54 a 54 b 54 c 55 d 55 a 55 a 55 a 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education | Please select |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 f 55 g 55 h | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed | Please select |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: | Please select |
| 54 54 a 54 b 54 c 55 c 55 a 55 c 55 a 55 a 56 a 56 a 57 a 56 a 57 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client | Please select |
| 54 54 a 54 b 54 c 55 c 55 a 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product | Please select |
| 54 54 a 54 b 54 c 55 d 55 a 55 a 55 c 55 c 55 c 55 c 55 c 55 c 55 d 55 c 55 c 55 d 55 c 55 d 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Trainag and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel | Please select |
| 54 54 a 54 b 54 c 55 d 55 a 55 a 55 c 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h 56 a 57 a 57 a 57 b 57 c 57 d | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography | Please select |
| 54 54 a 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 d 55 f 55 g 55 h 56 a 57 a 57 c 57 d 58 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | Please select |
| 54 54 a 54 b 54 c 54 c 55 d 55 a 55 c 55 d 55 c 55 d 55 d 55 f 56 56 a 57 a 57 a 57 d 58 58 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Trainsaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | Please select Please select |
| 54 54 a 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 d 55 f 55 g 55 h 56 a 57 a 57 c 57 d 58 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | Please select |

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1

| 58 e | Name Screening | Please select |
|-----------------|---|-----------------------------|
| 58 f | Transaction Screening | Please select |
| 58 g | Training and Education | Please select |
| 59 | Has the Entity's Sanctions EWRA been completed in the last 12 months? | Please select |
| 59 a | If N, provide the date when the last Sanctions EWRA was completed. | |
| 60 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 60 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 61 | If appropriate, provide any additional information/context to the answers in this section. | |
| 7. KYC. | CDD and EDD | |
| 62 | Does the Entity verify the identity of the customer? | Please select |
| 63 | Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days? | Please select |
| 64 | Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: | |
| 64 a | Customer identification | Please select |
| 64 b | Expected activity | Please select |
| 64 c | Nature of business/employment | Please select |
| 64 d | Ownership structure | Please select |
| 64 e | Product usage | Please select |
| 64 f | Purpose and nature of relationship | Please select |
| 64 g | Source of funds | Please select |
| 64 h | Source of wealth | Please select |
| 65 | Are each of the following identified: | |
| 65 a | Ultimate beneficial ownership | Please select |
| 65 a1 | Are ultimate beneficial owners verified? | Please select |
| 65 b | Authorised signatories (where applicable) | Please select |
| 65 c | Key controllers | Please select |
| 65 d 66 | Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? | Please select Please select |
| 67 | Does the due diligence process result in customers receiving a risk classification? | Please select |
| 67 a | If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: | |
| 67 a1 | Product Usage | Please select |
| 67 a2 | Geography | Please select |
| 67 a3 | Business Type/Industry | Please select |
| 67 a4 | Legal Entity type | Please select |
| 67 a5 | Adverse Information | Please select |
| 67 a6 | Other (specify) | |
| 68 | For high risk non-individual customers, is a site visit a part of your KYC process? | Please select |
| 68 a | If Y, is this at: | |
| 68 a1 | Onboarding | Please select |
| 68 a2 | KYC renewal | Please select |
| 68 a3 | Trigger event | Please select |
| 68 a4 68 a4a | Other If yes, please specify "Other" | Please select |
| 69 | Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? | Please select |
| 69 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 | 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 |
| | | Please select |
| 76 i | Non-account customers | Please select |
| 76 j | Non-Government Organisations | |
| 76 k | Non-resident customers | Please select |
| 76 I | Nuclear power | Please select |
| 76 m | Payment Service Providers | Please select |
| 76 n | PEPs | Please select |
| 76 o | PEP Close Associates | Please select |
| 76 p | PEP Related | Please select |
| 76 q | 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 | |
| | or compliance 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? | |
|---|-------------------------|
| in Tere, decontinue, conortinue, tou course agoine : | |
| 80 Does the Entity perform an additional control or quality review on clients subject to EDD? Please select | |
| 81 Confirm that all responses provided in the above Section are representative of all the LE's branches Please select | |
| 81 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to | |
| 82 If appropriate, provide any additional information/context to the answers in this section. | |
| 8. MONITORING & REPORTING | No. of Concession, Name |
| 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? 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 and MTS | |
| 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? | |
| 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 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. | |
| 9. PAYMENT TRANSPARENCY | |
| 92 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Please select | |

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| 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 | Anti-Money Laundering and Counter-Terrorist Financing Ordinance, Cap. 615 |
| 93 c | lf N, explain | |
| 94 | Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages? | Please select |
| 95 | Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages? | Please select |
| 95 a | If Y, does the Entity have procedures to include beneficiary address including country in cross border payments? | Please select |
| 96 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 96 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 97 | If appropriate, provide any additional information/context to the answers in this section. | |
| 10. SANC | TIONS | |
| 98 | Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? | Please select |
| 99 | Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)? | Please select |
| 100 | Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? | Please select |
| 101 | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? | Please select |
| 102 | What is the method used by the Entity for sanctions screening? | Please select |
| 102 a | If 'automated' or 'both automated and manual' selected: | and the second |
| 102 a1 | Are internal system of vendor-sourced tools used? | Please select |
| 102 a1a | If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? | |
| 102 a2 | When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110) | Please select |
| 103 | Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? | Please select |
| 104 | What is the method used by the Entity? | Please select |

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| 105 | | |
|-------|--|-----------------------------|
| | Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening? | Please select |
| | 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) | |
| | 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 |
| | 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. | |
| | If appropriate, provide any additional information/context to the answers in this section. | |
| | G & EDUCATION | |
| | 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 |
| | 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 |
| | Non-employed workers (contractors/consultants) | Please select |
| | Does the Entity provide AML, CTF & Sanctions training | |
| | that is targeted to specific roles, responsibilities and high-risk products, services and activities? | Please select |
| 113 | | Please select Please select |
| 113 | high-risk products, services and activities? Does the Entity provide customised training for AML, | |

: :

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

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| 129 | Does the Entity have real time monitoring to detect fraud? | Please select |
|-----------------------------------|--|--|
| 130 | Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID? | Please select |
| 131 | Confirm that all responses provided in the above section are representative of all the LE's branches | Please select |
| 131 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 132 | If appropriate, provide any additional information/context to the answers in this section. | |
| Wolfsberg Gro Declaration S | on Statement oup Correspondent Banking Due Diligence Questionnaire 2023 (CE statement (To be signed by Global Head of Correspondent Bank .aundering, Chief Compliance Officer, Global Head of Financial | king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of |
| Banco Bilba | o Vizcaya Argentaria, S.A. (Financial Institut | ion name) is fully committed to the fight against financial crime and makes |
| every effort to | | s, regulations and standards in all of the jurisdictions in which it does business and holds accounts. |
| | Institution understands the critical importance of having effectivulatory obligations. | ve and sustainable controls to combat financial crime in order to protect its reputation and to meet its |
| The Financia standards. | Institution recognises the importance of transparency regardin | g parties to transactions in international payments and has adopted/is committed to adopting these |
| | Institution further certifies it complies with <i>I</i> is working to compl on provided in this Wolfsberg CBDDQ will be kept current and v | y with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. vill be updated no less frequently than every eighteen months. |
| The Financia | Institution commits to file accurate supplemental information or | a timely basis. |
| I, the answers Institution. | | of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that my honest belief, and that I am authorised to execute this declaration on behalf of the Financial |
| L Edna LIU | (MLRO or equ | valent), certify that I have read and understood this declaration, that the answers provided in this |
| Wolfsberg CE | | am authorised to execute this declaration on behalf of the Financial Institution. |
| | (Signature & Dat | e) |
| 1 | / | |
| 4 | 08 January 2024 | |
| 1-C | (Signature & Dat | e) |
| 1.00 | | |
| | | |

1.2.4.8

the Wolfsberg Group

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

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

| No# | Question | Answer |
|-----------|---|---|
| 1. ENTITY | & OWNERSHIP | |
| 1 | Full Legal Name | Banco Bilbao Vizcaya Argentaria S.A |
| 2 | Append a list of foreign branches which are covered by this questionnaire | Singapore branch |
| 3 | Full Legal (Registered) Address | 80 Raffles Place, #55-02 UOB Plaza 1, Singapore 048624. |
| 4 | Full Primary Business Address (if different from above) | |
| 5 | Date of Entity incorporation/establishment | 28/03/2006 |
| 6 | Select type of ownership and append an ownership chart if available | |
| 6 a | Publicly Traded (25% of shares publicly traded) | Please select |
| 6 a1 | If Y, indicate the exchange traded on and ticker symbol | |
| 6 b | Member Owned/Mutual | Please select |
| 6 c | Government or State Owned by 25% or more | Please select |
| 6 d | Privately Owned | Please select |
| 6 d1 | If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more | |
| 7 | % of the Entity's total shares composed of bearer shares | |
| 8 | Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)? | Please select |
| 8 a | If Y, provide the name of the relevant branch/es which operate under an OBL | |
| 9 | Does the Bank have a Virtual Bank License or provide services only through online channels? | Please select |
| 10 | Name of primary financial regulator/supervisory authority | Monetary Authority of Singapore |
| 11 | Provide Legal Entity Identifier (LEI) if available | |
| 12 | Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ) | |
| 1 | | |

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| 13 | Jurisdiction of licensing authority and regulator of ultimate parent | |
|-----------|--|---|
| | | |
| 14 | Select the business areas applicable to the Entity | and a state of the second s |
| 14 a | Retail Banking | No |
| 14 b | Private Banking | No |
| 14 c | Commercial Banking | Please select |
| 14 d | Transactional Banking | |
| | | Please select |
| 14 e | Investment Banking | No |
| 14 f | Financial Markets Trading | No |
| 14 g | Securities Services/Custody | No |
| 14 h | Broker/Dealer | No |
| 14 i | Multilateral Development Bank | No |
| 14 j | Wealth Management | No |
| 14 k | Other (please explain) | |
| 15 | Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided) | Yes |
| 15 a | If Y, provide the top five countries where the non- resident customers are located. | Hong Kong, Australia, Ireland, Saudi Arabia and Netherlands |
| 16 | Select the closest value: | |
| 16 a | Number of employees | 1-50 |
| 16 b | Total Assets | |
| 20215-012 | | Greater than \$500 million |
| 17 | Confirm that all responses provided in the above Section are representative of all the LE's branches. | Please select |
| 17 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 18 | If appropriate, provide any additional information/context to the answers in this section. | |
| 2. PROD | UCTS & SERVICES | |
| 19 | Does the Entity offer the following products and services: | |
| 19 a | Correspondent Banking | No |
| 19 a1 | IfY | |
| 19 a1a | Does the Entity offer Correspondent Banking services to domestic banks? | Please select |
| 19 a1b | Does the Entity allow domestic bank clients to provide downstream relationships? | Please select |
| 19 a1c | Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? | Please select |
| 19 a1d | Does the Entity offer Correspondent Banking services to foreign banks? | Please select |
| 19 a1e | Does the Entity allow downstream relationships with foreign banks? | Please select |
| 19 a1f | Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? | Please select |
| 19 a1g | Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? | Please select |
| 19 a1h | Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? | |
| 19 a1h1 | MSBs | Please select |
| 19 a1h2 | MVTSs | |
| | PSPs | Please select Please select |
| 19 a1h3 | | |

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

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| 49 i | Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees | Please select |
|------------------|---|-----------------------------|
| 49 j | Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk | Please select |
| 49 k | Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates | Please select |
| 49 | Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship | Please select |
| 49 m | Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News | Please select |
| 49 n | Outline the processes for the maintenance of internal "watchlists" | Please select |
| 50 | Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business? | Please select |
| 51 | Does the Entity have record retention procedures that comply with applicable laws? | Please select |
| 51 a | If Y, what is the retention period? | Please select |
| 52 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 52 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 53 | If appropriate, provide any additional information/context to the answers in this section. | |
| 6. AML, C1 54 | F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: | |
| 54 a | Client | Please select |
| 54 b | Product | Please select |
| 54 c | Channel | Please select |
| 54 d | Geography | Please select |
| 55 | Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: | |
| 55 a | Transaction Monitoring | Please select |
| 55 b 55 c | Customer Due Diligence PEP Identification | Please select |
| 55 d | Transaction Screening | Please select Please select |
| 55 e | Name Screening against Adverse Media/Negative News | Please select |
| 55 f | Training and Education | Please select |
| 55 g | Governance | Please select |
| 55 h | Management Information | Please select |
| 56 | Has the Entity's AML & CTF EWRA been completed in the last 12 months? | Please select |
| 56 a | If N, provide the date when the last AML & CTF EWRA was completed. | |
| 57 | Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: | |
| 57 a | Client | Please select |
| 57 b | Product | Please select |
| 57 c | Channel | Please select |
| 57 d | Geography | Please select |
| 58 | Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | |
| 58 a | Customer Due Diligence | Please select |
| 58 b | Governance | Please select |
| 58 c | List Management | Please select |
| 58 d | Management Information | Please select |

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| 19 a1i | Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs? | Please select |
|----------------------|---|--|
| 19 b | Cross-Border Bulk Cash Delivery | Please select |
| 19 c | Cross-Border Remittances | Please select |
| 19 d | Domestic Bulk Cash Delivery | Please solect |
| 19 e | Hold Mail | No |
| 19 f | International Cash Letter | Please select |
| 1 C. (C) 1 C. | | |
| 19 g | Low Price Securities | Please select |
| 19 h | Payable Through Accounts | Please select |
| 19 i | Payment services to non-bank entities who may then offer third party payment services to their customers? | No |
| 19 i1 | If Y, please select all that apply below? | |
| 19 i2 | Third Party Payment Service Providers | Please select |
| 19 i3 | Virtual Asset Service Providers (VASPs) | Please select |
| 19 i4 | eCommerce Platforms | Please select |
| 19 15 | Other - Please explain | |
| | | |
| 19 j | Private Banking | No |
| 19 k | Remote Deposit Capture (RDC) | Please select |
| 191 | Sponsoring Private ATMs | Please select |
| 19 m | Stored Value Instruments | No |
| 19 n | Trade Finance | Please select |
| 19 0 | Virtual Assets | Please select |
| 19 p | For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence: | |
| | | |
| 19 p1 | Check cashing service | No |
| 19 p1a | If yes, state the applicable level of due diligence | Please select |
| 19 p2 | Wire transfers | No |
| 19 p2a | If yes, state the applicable level of due diligence | Please select |
| 19 p3 | Foreign currency conversion | No |
| 19 p3a | If yes, state the applicable level of due diligence | Please select |
| 19 p4 | Sale of Monetary Instruments | No |
| 19 p4a | If yes, state the applicable level of due diligence | Please select |
| 19 p5 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. | No Walk-in customers for BBVA Singapore branch |
| 19 q | Other high-risk products and services identified by the Entity (please specify) | |
| 20 | Confirm that all responses provided in the above Section are representative of all the LE's branches. | Please select |
| 20 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 21 | If appropriate, provide any additional information/context to the answers in this section, | |
| | CTF & SANCTIONS PROGRAMME | |
| 22 | Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: | |
| 22 a | Appointed Officer with sufficient experience/expertise | Please select |
| 22 b | Adverse Information Screening | Please select |
| 22 c | Beneficial Ownership | Please select |
| 22 d | Cash Reporting | Not applicable |
| 22 e | CDD | Please select |
| 22 f | EDD | Please select |
| 441 | | |
| ADDING | Independent Lecting | Please select |
| 22 g | Independent Testing | |
| ATCHENT | Periodic Review | Please select |
| 22 g | | |
| 22 g 22 h | Periodic Review | Please select |
| 22 g 22 h 22 i | Periodic Review Policies and Procedures | Please select Please select |

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| 22 m | Suspicious Activity Reporting | Please select |
|------|---|-----------------------|
| 22 n | Training and Education | Please select |
| 22 0 | Transaction Monitoring | |
| 23 | How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? | Please select 1-10 |
| 24 | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29. | Please select |
| 25 | Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme? | Please select |
| 26 | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? | Please select |
| 26 a | If Y, provide further details | |
| 27 | Does the entity have a whistleblower policy? | Please select |
| 28 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 28 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 29 | If appropriate, provide any additional information/context to the answers in this section. | |
| | | |
| 3 | TI BRIBERY & CORRUPTION | |
| 30 | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? | Please select |
| 31 | Does the Entity have an enterprise wide programme that sets minimum ABC standards? | Please select |
| 32 | Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? | Please select |
| 33 | Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? | Please select |
| 34 | Is the Entity's ABC programme applicable to: | Please select |
| 35 | Does the Entity have a global ABC policy that: | |
| 35 a | Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage. | Please select |
| 35 b | Includes enhanced requirements regarding interaction with public officials? | Please select |
| 35 c | Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? | |
| 36 | Does the Entity have controls in place to monitor the effectiveness of their ABC programme? | Please select |
| 37 | Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? | Please select |
| 38 | Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? | Please select |
| 38 a | If N, provide the date when the last ABC EWRA was completed. | |
| 39 | Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? | Please select |
| 40 | Does the Entity's ABC EWRA cover the inherent risk components detailed below: | Please select |
| 40 a | Potential liability created by intermediaries and other third-party providers as appropriate | Please select |

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| 58 e | Name Screening | Please select |
|-----------------|---|-----------------------------|
| 58 f | Transaction Screening | Please select |
| 58 g | Training and Education | Please select |
| 59 | Has the Entity's Sanctions EWRA been completed in the last 12 months? | Please select |
| 59 a | If N, provide the date when the last Sanctions EWRA was completed. | |
| 60 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 60 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 61 | If appropriate, provide any additional information/context to the answers in this section. | |
| 7. KYC. (| DDD and EDD | |
| 62 | Does the Entity verify the identity of the customer? | Please select |
| 63 | Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days? | Please select |
| 64 | Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: | |
| 64 a | Customer identification | Please select |
| 64 b | Expected activity | Please select |
| 64 c | Nature of business/employment | Please select |
| 64 d | Ownership structure | Please select |
| 64 e | Product usage | Please select |
| 64 f | Purpose and nature of relationship | Please select |
| 64 g | Source of funds | Please select |
| 64 h | Source of wealth | Please select |
| 65 | Are each of the following identified: | |
| 65 a | Ultimate beneficial ownership | Please select |
| 65 a1 | Are ultimate beneficial owners verified? | Please select |
| 65 b | Authorised signatories (where applicable) | Please select |
| 65 c | Key controllers | Please select |
| 65 d 66 | Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? | Please select Please select |
| 67 | Does the due diligence process result in customers receiving a risk classification? | Please select |
| 67 a | If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: | |
| 67 a1 | Product Usage | Please select |
| 67 a2 | Geography | Please select |
| 67 a3 | Business Type/Industry | Please select |
| 67 a4 | Legal Entity type | Please select |
| 67 a5 | Adverse Information | Please select |
| 67 a6 | Other (specify) | |
| 68 | For high risk non-individual customers, is a site visit a part of your KYC process? | Please select |
| 68 a | If Y, is this at: | |
| 68 a1 | Onboarding | Please select |
| 68 a2 | KYC renewal | Please select |
| 68 a3 | Trigger event | Please select |
| 68 a4 68 a4a | Other If yes, please specify "Other" | Please select |
| | | |
| 69 | Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? | Please select |
| 69 69 a | screening customers for Adverse Media/Negative | Please select |
| 017425 | screening customers for Adverse Media/Negative News? | Please select Please select |

| 69 a3 | Trigger event | Please select |
|--------------|---|--|
| 70 | What is the method used by the Entity to screen for Adverse Media/Negative News? | Please select |
| 71 | Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? | Please select |
| 71 a | If Y, is this at: | |
| 71 a1 | Onboarding | Please select |
| 71 a2 | KYC renewal | Please select |
| 71 a3 | Trigger event | Please select |
| 72 | What is the method used by the Entity to screen PEPs? | Please select |
| 73 | Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? | Please select |
| 74 | Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? | Please select |
| 74 a | If yes, select all that apply: | The second s |
| 74 a1 | Less than one year | Please select |
| 74 a2 | 1 – 2 years | Please select |
| 74 a3 | 3 – 4 years | Please select |
| 74 a4 | 5 years or more | No |
| 74 a5 | Trigger-based or perpetual monitoring reviews | Please select |
| 74 a6 | Other (Please specify) | |
| 75 | Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews? | Please select |
| 76 | From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme? | |
| 76 a | Arms, defence, military | Please select |
| 76 b | Respondent Banks | Please select |
| 76 b1 | If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? | Please select |
| 76 c | Embassies/Consulates | Do not have this category of customer or industry |
| 76 d | Extractive industries | Please select |
| 76 e | Gambling customers | Do not have this category of customer or industry |
| 76 f | General Trading Companies | Please select |
| 76 g | Marijuana-related Entities | Do not have this category of customer or industry |
| 76 h | MSB/MVTS customers | Do not have this category of customer or industry |
| 76 i | Non-account customers | Please select |
| | | |
| 76 j | Non-Government Organisations | Do not have this category of customer or industry |
| 76 k | Non-resident customers | Please select |
| 76 I | Nuclear power | Do not have this category of customer or industry |
| 76 m | Payment Service Providers | Do not have this category of customer or industry |
| 76 n | PEPs | Do not have this category of customer or industry |
| 76 o | PEP Close Associates | Do not have this category of customer or industry |
| 76 p | PEP Related | Do not have this category of customer or industry |
| 76 q | Precious metals and stones | Please select |
| 76 r | Red light businesses/Adult entertainment | Do not have this category of customer or industry |
| 76 s | Regulated charities | Do not have this category of customer or industry |
| 76 t | Shell banks | Please select |
| 76 u | Travel and Tour Companies | Do not have this category of customer or industry |
| 76 v | Unregulated charities | |
| | | Do not have this category of customer or industry |
| 76 w | Used Car Dealers | Do not have this category of customer or industry |
| 76 x 76 y | Virtual Asset Service Providers Other (specify) | Do not have this category of customer or industry |
| 77 | If restricted, provide details of the restriction | |
| 78 | Does EDD require senior business management and/ or compliance approval? | Please select |

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| | If Y indicate who provides the approval: | Please select |
|---|---|---|
| 79 | Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents? | Νο |
| 80 | Does the Entity perform an additional control or quality review on clients subject to EDD? | Please select |
| 81 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 31 a | If N, clarify which questions the difference/s relate to and the branch/cs that this applies to | 79 - Singapore branch is in to wholesale corporate banking activities and we do not have lawyers, accountants, consultants and real estate agents as customers. |
| 32 | If appropriate, provide any additional information/context to the answers in this section. | |
| B. MONITO | DRING & REPORTING | |
| 33 | Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity? | Please select |
| 34 | What is the method used by the Entity to monitor transactions for suspicious activities? | Manual |
| 84 a | If manual or combination selected, specify what type of transactions are monitored manually | Trade Finance related transactions are monitored for suspicious activity by - subjecting the bills of lading to sample verification - monitoring the vessel voyage from port of loading unlil port of discharge - subjecting the counter party to pre-clearance process before accepting the transaction - screening of all relevant parties from the Trade documents |
| 84 b | If automated or combination selected, are internal system or vendor-sourced tools used? | Please select |
| 84 b1 | If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool? | |
| 84 b2 | When was the tool last updated? | Please select |
| 84 b3 | When was the automated Transaction Monitoring application last calibrated? | Please select |
| 85 | Does the Entity have regulatory requirements to report suspicious transactions? | Please select |
| 85 a | If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? | Please select |
| 86 | Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? | Please select |
| 87 | Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? | Please select |
| 88 | Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? | Please select |
| 89 | Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? | Please select |
| 90 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 90 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to | Combination of manual and automated is for name screening. Manual for identifying suspicious activities |
| 91 | If appropriate, provide any additional information/context to the answers in this section. | |
| A Design of president of the contraction of | INT TRANSPARENCY | |
| 92 | Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? | Please select |

| 93 | Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: | |
|----------------|--|-------------------------------|
| 93 a | FATF Recommendation 16 | Please select |
| 93 b | Local Regulations | Please select |
| 93 b1 | If Y, specify the regulation | MAS Notice 626 - Paragraph 11 |
| 93 c | lf N, explain | |
| 94 | Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages? | Please select |
| 95 | Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages? | Please select |
| 95 a | If Y, does the Entity have procedures to include beneficiary address including country in cross border payments? | Please select |
| 96 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 96 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 97 | If appropriate, provide any additional information/context to the answers in this section. | |
| 40.0410 | TIONO | |
| 10. SANC 98 | Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? | Please select |
| 99 | Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local Jurisdiction)? | Please select |
| 100 | Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? | Please select |
| 101 | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? | Please select |
| 102 | What is the method used by the Entity for sanctions screening? | Both Automated and Manual |
| 102 a | If 'automated' or 'both automated and manual' selected: | |
| 102 a1 | Are internal system of vendor-sourced tools used? | Please select |
| 102 a1a | If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? | |
| 102 a2 | When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110) | Please select |
| 103 | Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? | Please select |
| 104 | What is the method used by the Entity? | Please select |

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| 105 | Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening? | Please select |
|------------|--|---|
| 06 | Select the Sanctions Lists used by the Entity in its sanctions screening processes: | |
| 06 a | Consolidated United Nations Security Council Sanctions List (UN) | Please select |
| 06 b | United States Department of the Treasury's Office of Foreign Assets Control (OFAC) | Please select |
| 106 c | Office of Financial Sanctions Implementation HMT (OFSI) | Please select |
| 06 d | European Union Consolidated List (EU) | Please select |
| 06 e | Lists maintained by other G7 member countries | Please select |
| 106 f | Other (specify) | MAS Alert List and Payment blocking under Gambling Control Act Order 2023 |
| 107 | When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against: | |
| 107 a | Customer Data | Please select |
| 107 b | Transactions | Please select |
| 108 | Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions? | Please select |
| 109 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 109 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 110 | If appropriate, provide any additional information/context to the answers in this section. | |
| | ING & EDUCATION | |
| 111 | Does the Entity provide mandatory training, which includes: | |
| 111 a | Identification and reporting of transactions to government authorities | Please select |
| 111 b | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered | Please select |
| 111 c | Internal policies for controlling money laundering, terrorist financing and sanctions violations | Please select |
| 111 d | New issues that occur in the market, e.g. significant regulatory actions or new regulations | Please select |
| 111 e | Conduct and Culture | Please select |
| 111 f | Fraud | Please select |
| 112 | Is the above mandatory training provided to: | |
| 112 a | Board and Senior Committee Management | Please select |
| 112 b | 1st Line of Defence | Please select |
| 112 c | 2nd Line of Defence | Please select |
| 112 d | 3rd Line of Defence | Please select |
| 112 e | Third parties to which specific FCC activities have been outsourced | Please select |
| 112 f | Non-employed workers (contractors/consultants) | Please select |
| 113 | Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities? | 9 Please select |
| 114 | Does the Entity provide customised training for AML, CTF and Sanctions staff? | Please select |
| 114 a | If Y, how frequently is training delivered? | Please select |
| 115 | Confirm that all responses provided in the above | |
| (d.))))))) | Section are representative of all the LE's branches | Please select |

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| 115 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
|----------------|--|-----------------------------|
| 116 | Managements accurate any solution of | |
| 110 | If appropriate, provide any additional information/context to the answers in this section. | |
| 12. QUALI | TY ASSURANCE /COMPLIANCE TESTING | |
| 117 | Does the Entity have a program wide risk based | |
| | Quality Assurance programme for financial crime (separate from the independent Audit function)? | Please select |
| 118 | Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)? | Please select |
| 119 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 119 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 120 | If appropriate, provide any additional information/context to the answers in this section. | |
| 13. AUDIT | | |
| 121 | In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? | Please select |
| 122 | How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: | |
| 122 a | Internal Audit Department | Please select |
| 122 b | External Third Party | Please select |
| 123 | Does the internal audit function or other independent third party cover the following areas: | |
| 123 a | AML, CTF, ABC, Fraud and Sanctions policy and procedures | Please select |
| 123 b | Enterprise Wide Risk Assessment | Please select |
| 123 c 123 d | Governance KYC/CDD/EDD and underlying methodologies | Please select Please select |
| 123 u 123 e | Name Screening & List Management | Please select |
| 123 f | Reporting/Metrics & Management Information | Please select |
| 123 g | Suspicious Activity Filing | Please select |
| 123 h | Technology | Please select |
| 123 i | Transaction Monitoring | Please select |
| 123 j | Transaction Screening including for sanctions | Please select |
| 123 k | Training & Education | Please select |
| 1231 | Other (specify) | |
| 124 | Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? | Please select |
| 125 | Confirm that all responses provided in the above section are representative of all the LE's branches | Please select |
| 125 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 126 | If appropriate, provide any additional information/context to the answers in this section. | |
| 14. FRA | UD | |
| 127 | Does the Entity have policies in place addressing fraud risk? | Please select |
| 128 | Does the Entity have a dedicated team responsible for preventing & detecting fraud? | Please select |

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| 129 | Does the Entity have real time monitoring to detect fraud? | Please select |
|-----------------------------------|---|---|
| 130 | Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID? | Please select |
| 131 | Confirm that all responses provided in the above section are representative of all the LE's branches | Please select |
| 131 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 132 | If appropriate, provide any additional information/context to the answers in this section. | |
| Wolfsberg C | tion Statement Group Correspondent Banking Due Diligence Questionnaire 2023 (C Statement (To be signed by Global Head of Correspondent Ban y Laundering, Chief Compliance Officer, Global Head of Financia | king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of |
| Banco Bilt | bao Vizcaya Argentaria S.A (Financial Institu | tion name) is fully committed to the fight against financial crime and makes |
| Construction and the construction | | s, regulations and standards in all of the jurisdictions in which it does business and holds accounts. ive and sustainable controls to combat financial crime in order to protect its reputation and to meet its |
| legal and re | egulatory obligations. | |
| The Finance standards. | | ng parties to transactions in international payments and has adopted/is committed to adopting these |
| The Financ The inform | ial Institution further certifies it complies with / is working to comp ation provided in this Wolfsberg CBDDQ will be kept current and | by with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. will be updated no less frequently than every eighteen months. |
| The Financ | cial Institution commits to file accurate supplemental information o | n a timely basis. |
| | a Savira (Global Head rs provided in this Wolfsberg CBDDQ are complete and correct t | of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that o my honest belief, and that I am authorised to execute this declaration on behalf of the Financial |
| I, <u>Viswar</u> Wolfsberg | CBDDQ are complete and correct to my honest belief, and that I | uivalent), certify that I have read and understood this declaration, that the answers provided in this am authorised to execute this declaration on behalf of the Financial Institution. |
| | Daniella SAVIRA 2024.01.15 16:56:11 +08'00' (Signature & Da | ite) |
| 1. | | ate) |
| | V- V / | |



the Wolfsberg Group

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

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire at the legal entry (very including LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

| No# | Question | Answer |
|-----------|---|---|
| 1. ENTITY | & OWNERSHIP | |
| 1 | Full Legal Name | BANCO BILBAO VIZCAYA ARGENTARIA SA French Branch |
| 2 | Append a list of foreign branches which are covered by this questionnaire | French Branch |
| 3 | Full Legal (Registered) Address | 29 Avenue de l'Opéra 75001 Paris - FRANCE |
| 4 | Full Primary Business Address (if different from above) | |
| 5 | Date of Entity incorporation/establishment | 1902 |
| 6 | Select type of ownership and append an ownership chart if available | |
| 6 a | Publicly Traded (25% of shares publicly traded) | Please select |
| 6 a1 | If Y, indicate the exchange traded on and licker symbol | |
| 6 b | Member Owned/Mutual | Please select |
| 6 c | Government or State Owned by 25% or more | Please select |
| 6 d | Privately Owned | Please select |
| 6 d1 | If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more | |
| 7 | % of the Entity's total shares composed of bearer shares | |
| 8 | Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)? | Please select |
| 8 a | If Y, provide the name of the relevant branch/es which operate under an OBL | |
| 9 | Does the Bank have a Virtual Bank License or provide services only through online channels? | Please select |
| 10 | Name of primary financial regulator/supervisory authority | Banque de France / ACPR (Autonité de Contrôle Prudentiel et de Résolution |
| 11 | Provide Legal Entity Identifier (LEI) if available | 894500U247KEMA0HHP26 |
| 12 | Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ) | |
| | | |

| 40 | I had all also sells and the desired set in the se | |
|--------------|--|--|
| 13 | Jurisdiction of licensing authority and regulator of | |
| | ultimate parent | |
| | and a star show the subsection of the | |
| | | |
| 14 | Select the business areas applicable to the Entity | |
| 14 a | Retail Banking | No |
| 14 b | Private Banking | No |
| 14 c | Commercial Banking | Please select |
| 14 d | Transactional Banking | Please select |
| 14 e | Investment Banking | |
| 14 6 14 f | | Please select |
| | Financial Markets Trading | Please select |
| 14 g | Securities Services/Custody | No |
| 14 h | Broker/Dealer | Please select |
| 14 i | Multilateral Development Bank | No |
| 14 j | Wealth Management | No |
| 14 k | Other (please explain) | |
| | | |
| 15 | Does the Entity have a significant (10% or more) | |
| | portfolio of non-resident customers or does it derive | |
| | more than 10% of its revenue from non-resident | Please select |
| | customers? (Non-resident means customers primarily | Please select |
| | resident in a different jurisdiction to the location | |
| | where bank services are provided) | 인생님은 그 이 것이 같아. 말한 것이 많은 것이 같아. 비장을 가 나는 것이 없는 것이 같아. |
| 15 a | If Y, provide the top five countries where the non- | |
| | resident customers are located. | 정말 승규가 같은 것은 것 같은 것을 가 같아요. 물건 것 같아요. 물건 것 같아요. |
| | | |
| | | |
| | | |
| 16 | Select the closest value: | Construction of the second |
| 16 a | Number of employees | 51-200 |
| 16 b | Total Assets | Please select |
| 17 | Confirm that all responses provided in the above | |
| | Section are representative of all the LE's branches. | Please select |
| 17 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 18 | If appropriate, provide any additional information/context to the answers in this section. | |
| | monnauchicontext to the answers in this section. | |
| 2. PRODI | JCTS & SERVICES | |
| 19 | Does the Entity offer the following products and | |
| | services: | 생활 승규는 친구가 가지 않는 것을 가지 않는 것은 것을 가지 않는 것이 없는 것이 없이 않 않 않이 않 |
| 19 a | Correspondent Banking | |
| 19 a1 | If Y | No |
| | | |
| 19 a1a | Does the Entity offer Correspondent Banking services to domestic banks? | Please select |
| 19 a1b | Does the Entity allow domestic bank clients to provide downstream relationships? | Please select |
| 19 a1c | Does the Entity have processes and procedures | |
| | in place to identify downstream relationships with domestic banks? | Please select |
| | | |
| 19 a1d | Does the Entity offer Correspondent Banking services to foreign banks? | Please select |
| 19 a1e | Does the Entity allow downstream relationships with foreign banks? | Please select |
| 19 a1f | Does the Entity have processes and procedures in place to identify downstream relationships with | Please select |
| | foreign banks? | |
| 19 a1g | Does the Entity offer Correspondent Banking services to regulated Money Services Businesses | Please select |
| | (MSBs)/Money Value Transfer Services (MVTSs)? | Please select |
| 19 a1h | Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? | |
| 19 a1h1 | MSBs | Please select |
| 19 a1h2 | MVTSs | Please select |
| 19 a1h3 | PSPs | Please select |
| | | I IUGS SUICE |

| 19 a1i | Does the Entity have processes and procedures | |
|---|--|--|
| | in place to identify downstream relationships with MSBs /MVTSs/PSPs? | No |
| 19 b | Cross-Border Bulk Cash Delivery | No |
| 19 c | Cross-Border Remittances | Please select |
| 19 d | Domestic Bulk Cash Delivery | Please select |
| 19 e | Hold Mail | No |
| 19 f | International Cash Letter | Please select |
| 19 g | Low Price Securities | No |
| 19 h | Payable Through Accounts | Please select |
| 19 i | Payment services to non-bank entities who may | Please select |
| 191 | then offer third party payment services to their customers? | Νο |
| 19 i1 | If Y, please select all that apply below? | an a |
| 19 i2 | Third Party Payment Service Providers | Please select |
| 19 i3 | Virtual Asset Service Providers (VASPs) | Please select |
| 19 i4 | eCommerce Platforms | Please select |
| 19 i5 | Other - Please explain | |
| 19 j | Private Banking | No |
| 19 k | Remote Deposil Capture (RDC) | Please select |
| 191 | Sponsoring Private ATMs | Please select |
| 19 m | Stored Value Instruments | No |
| 19 n | Trade Finance | Please select |
| 19 0 | Virtual Assets | Please select |
| 19 p | For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence: | |
| 19 p1 | Check cashing service | No |
| | | |
| 19 p1a | If yes, state the applicable level of due diligence | Please select |
| 19 p2 | Wire transfers | Please select |
| 19 p2a | If yes, state the applicable level of due diligence | Please select |
| 19 p3 | Foreign currency conversion | Please select |
| 19 p3a | If yes, state the applicable level of due diligence | Please select |
| 19 p4 | Sale of Monetary Instruments | Please select |
| 19 p4a | If yes, state the applicable level of due diligence | Please select |
| 19 p5 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. | N/A |
| | | |
| 19 q | Other high-risk products and services identified by the Entity (please specify) | |
| 19 q 20 | | Please select |
| | the Entity (please specify) Confirm that all responses provided in the above | Please select |
| 20 | the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to | Please select |
| 20 20 a 21 3. AML, C | the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME | Please select |
| 20 20 a 21 3. AML, C 22 | the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional Information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: | Please select: |
| 20 20 a 21 3. AML, C | the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional Information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the | Please select |
| 20 20 a 21 3. AML, C 22 22 a 22 a 22 b | the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening | Please select Please select |
| 20 20 a 21 3. AML, C 22 22 a 22 a 22 b 22 c | the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership | Please select Please select Please select Please select |
| 20 20 a 21 3. AML, C 22 22 a 22 b 22 c 22 c 22 d | the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting | Please select Please select Please select Not applicable |
| 20 20 a 21 3. AML, C 22 22 a 22 b 22 c 22 c 22 c 22 c 22 c | the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD | Please select Please select Please select Please select Please select Please select Not applicable Please select |
| 20 20 a 21 3. AML, C 22 22 a 22 b 22 c 22 c 22 c 22 c 22 c | the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting | Please select Please select Please select Not applicable |
| 20 20 a 21 3. AML, C 22 22 22 a 22 b 22 c 22 c 22 d 22 c 22 d 22 c 22 d 22 c | the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD | Please select Please select Please select Please select Please select Please select Not applicable Please select |
| 20 20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 c 22 c 22 c 22 c 22 c 22 c | the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership CDD EDD EDD | Please select |
| 20 20 a 21 3. AML, C 22 22 b 22 c 22 c 22 c 22 c 22 c 22 c 2 | the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review | Please select Pl |
| 20 20 a 21 3. AML, C 22 22 b 22 c 22 d 22 c 22 d 22 c 22 d 22 c 22 f 22 g 22 p 22 p 22 p 22 p 22 p | the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review Policies and Procedures | Please select Pl |
| 20 20 a 21 3. AML, C 22 22 b 22 c 22 b 22 c 22 d 22 c 22 d 22 e 22 f 22 g 22 h 22 z 22 h 22 z 22 h | the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening | Please select |
| 20 20 a 21 3. AML, C 22 22 b 22 c 22 d 22 c 22 d 22 c 22 d 22 c 22 f 22 g 22 p 22 p 22 p 22 p 22 p | the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review Policies and Procedures | Please select Pl |

| 22 m | Suspicious Activity Reporting | Please select |
|---------|---|---------------|
| 22 n | Training and Education | Please select |
| 22 0 | Transaction Monitoring | Please select |
| 23 | How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? | 1-10 |
| 24 | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29. | Please select |
| 25 | Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme? | Please select |
| 26 | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? | Please select |
| 26 a | If Y, provide further details | |
| 27 | Does the entity have a whistleblower policy? | Please select |
| 28 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 28 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 29 | If appropriate, provide any additional information/context to the answers in this section. | |
| 4. ANTI | BRIBERY & CORRUPTION | |
| 30 | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? | Please select |
| 31 | Does the Entity have an enterprise wide programme that sets minimum ABC standards? | Please select |
| 32 | Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? | Please select |
| 33 | Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? | Please select |
| 34 | Is the Entity's ABC programme applicable to: | Please select |
| 35 | Does the Entity have a global ABC policy that: | |
| 35 a | Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage. | Please select |
| 35 b | Includes enhanced requirements regarding interaction with public officials? | Please select |
| 35 c | Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? | Please select |
| 36 | Does the Entity have controls in place to monitor the effectiveness of their ABC programme? | Please select |
| 37 | Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? | Please select |
| 38 | Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? | Please select |
| 38 a | If N, provide the date when the last ABC EWRA was completed. | |
| 39 | Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? | Please select |
| 40 | Does the Entity's ABC EWRA cover the inherent risk components detailed below: | Please select |
| 40 a | Potential liability created by intermediaries and other third-party providers as appropriate | Please select |

| 40 b | Corruption risks associated with the countries and industries in which the Entity does business, directly | Please select |
|---|--|---|
| 40 c | or through intermediaries Transactions, products or services, including those | |
| | that involve state-owned or state-controlled entities or public officials | Please select |
| 40 d | Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions | Please select |
| 40 e | Changes in business activities that may materially increase the Entity's corruption risk | No |
| 41 | Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures? | Please select |
| 42 | Does the Entity provide mandatory ABC training to: | |
| 42 a | Board and senior Committee Management | Please select |
| 42 b | 1st Line of Defence | Please select |
| 42 c | 2nd Line of Defence | Please select |
| 42 d | 3rd Line of Defence | Please select |
| 42 e | Third parties to which specific compliance activities subject to ABC risk have been outsourced | No |
| 42 f | Non-employed workers as appropriate (contractors/consultants) | Νο |
| 43 | Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities? | Please select |
| 44 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 44 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 45 | If appropriate, provide any additional information/context to the answers in this section. | |
| 5. AML, 46 | CTF & SANCTIONS POLICIES & PROCEDURES Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: | |
| 46 a | Money laundering | Please select |
| 46 b | Terrorist financing | Please select |
| 46 c | Sanctions violations | Please select |
| 47 | Are the Entity's policies and procedures updated at least annually? | Please select |
| 48 | Has the Entity chosen to compare its policies and procedures against: | |
| 48 a | | |
| 48 a1 | U.S. Standards | Please select |
| | U.S. Standards If Y, does the Entity retain a record of the results? | Please select Please select |
| 48 b | | |
| 48 b 48 b1 | If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? | Please select |
| 48 b | If Y, does the Entity retain a record of the results? EU Standards | Please select Please select |
| 48 b 48 b1 49 49 a | If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts | Please select Please select |
| 48 b 48 b1 49 | If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs | Please select Please select Please select |
| 48 b 48 b1 49 49 a | If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for | Please select Please select Please select Please select Please select |
| 48 b 48 b1 49 49 a 49 a | If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide | Please select Please select Please select Please select Please select Please select |
| 48 b 48 b1 49 49 a 49 b 49 c | If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks | Please select Please select Please select Please select Please select Please select |
| 48 b 48 b1 49 49 a 49 b 49 c 49 d | If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides | Please select |
| 48 b 48 b1 49 49 a 49 b 49 c 49 c 49 d 49 e | If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with nother entity that provides services to shell banks Prohibit opening and keeping of accounts for | Please select |

| 49 i | Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees | Please select |
|--------------|---|---------------|
| 49 j | Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk | Please select |
| 49 k | Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates | Please select |
| 491 | Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship | Please select |
| 49 m | Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News | Please select |
| 49 n | Outline the processes for the maintenance of internal "watchlists" | Please select |
| 50 | Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business? | Please select |
| 51 | Does the Entity have record retention procedures that comply with applicable laws? | Please select |
| 51 a | If Y, what is the retention period? | Please select |
| 52 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 52 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 53 | If appropriate, provide any additional information/context to the answers in this section. | |
| | | |
| 54 | T & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: | |
| 54 a | Client | Please select |
| 54 b | Product | Please select |
| 54 c | Channel | Please select |
| 54 d 55 | Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: | Please select |
| 55 a | Transaction Monitoring | Please select |
| 55 b | Customer Due Diligence | Please select |
| 55 c | PEP Identification | Please select |
| 55 d | Transaction Screening | Please select |
| 55 e | Name Screening against Adverse Media/Negative News | Please select |
| 55 f | Training and Education | Please select |
| 55 g | Governance | Please select |
| 55 h | Management Information | Please select |
| 56 | Has the Entity's AML & CTF EWRA been completed in the last 12 months? | Please select |
| 56 a | If N, provide the date when the last AML & CTF EWRA was completed. | |
| 57 | Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: | |
| 57 a | Client | Please select |
| 57 b | Product | Please select |
| 57 c | Channel | Please select |
| 57 d | Geography | Please select |
| 58 | Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | |
| 58 a | Customer Due Diligence | Please select |
| 58 b 58 c | Governance List Management | Please select |
| 58 c 58 d | | Please select |
| | Management Information | Please select |

| | News Concessor | |
|------------|---|---|
| 58 e | Name Screening | Please select |
| 58 f | Transaction Screening | Please select |
| 58 g | Training and Education | Please select |
| 59 | Has the Entity's Sanctions EWRA been completed in the last 12 months? | Please select |
| 59 a | If N, provide the date when the last Sanctions EWRA was completed. | |
| 60 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 60 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 61 | If appropriate, provide any additional information/context to the answers in this section. | |
| 7. KYC, | CDD and EDD | |
| 62 | Does the Entity verify the identity of the customer? | Please select |
| 63 | Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days? | Please select |
| 64 | Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: | |
| 64 a | Customer identification | Please select |
| 64 b | Expected activity | Please select |
| 64 c | Nature of business/employment | Please select |
| 64 d | Ownership structure | Please select |
| 64 e | Product usage | Please select |
| 64 f | Purpose and nature of relationship | Please select |
| 64 g | Source of funds | Please select |
| 64 h | Source of wealth | Please select |
| 65 | Are each of the following identified: | |
| 65 a | Ultimate beneficial ownership | Please select |
| 65 a1 | Are ultimate beneficial owners verified? | Please select |
| 65 b | Authorised signatories (where applicable) | Please select |
| 65 c | Key controllers | Please select |
| 65 d 66 | Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? | Please select Please select |
| 67 | Does the due diligence process result in customers receiving a risk classification? | Please select |
| 67 a | If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: | |
| 67 a1 | Product Usage | Please select |
| 67 a2 | Geography | Please select |
| 67 a3 | Business Type/Industry | Please select |
| 67 a4 | Legal Entity type | Please select |
| 67 a5 | Adverse Information | Please select |
| 67 a6 | Other (specify) | |
| 68 | For high risk non-individual customers, is a site visit a part of your KYC process? | Please select |
| 68 a | If Y, is this at: | Excerns the second s |
| 68 a1 | Onboarding | Please select |
| 68 a2 | KYC renewal | Please select |
| 68 a3 | Trigger event | Please select |
| 68 a4 | Other | Please select |
| 68 a4a | If yes, please specify "Other" | |
| 69 | Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? | Please select |
| 69 a | If Y, is this at: | |
| 69 a1 | Onboarding | Please select |
| 69 a2 | KYC renewal | Please select |

| | F | |
|-------------|---|--|
| 69 a3 | Trigger event | Please select |
| 70 | What is the method used by the Entity to screen for Adverse Media/Negative News? | Please seleci |
| 71 | Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? | |
| 71 a | If Y, is this at: | |
| 71 ai | Onboarding | Please select |
| 71 a2 | KYC renewal | Please select |
| 71 a3 | Trigger event | Please select |
| 72 | What is the method used by the Entity to screen PEPs? | Please select |
| 73 | Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? | Piease select |
| 74 | is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? | Please soloct |
| 74 <u>a</u> | If yes, select all that apply: | |
| 74 a1 | Less than one year | Please select |
| 74 82 | 1 – 2 years | Please select |
| 74 43 | 3 – 4 years | Please select |
| 74 14 | S years or more | Please select |
| 74 a5 | Trigger-based or perpetual monitoring reviews | Please select |
| 74 a6 75 | Other (Please specify) Does the Entity maintain and report metrics on current | |
| | and past periodic or trigger event due diligence reviews? | Please select |
| 76 | From the list below, which categories of customers or industries are subject to EDD end/or are restricted, or prohibited by the Entity's FCC programme? | |
| 76 a | Arms, defence, military | Do not have this category of customer or industry |
| 76 b | Respondent Banks | Do not have this category of customer or industry |
| 76 b1 | If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? | Piease salect |
| 76 c | Embassies/Consulates | Do not have this category of customer or industry |
| 76 d | Extractive industries | No EDD/restriction or prohibition |
| 76 e | Gambling customers | Do not have this category of customer or industry |
| 76 f | General Trading Companies | EDD on risk-based approach |
| 76 g | Marijuana-related Entities | Do not have this category of customer or industry |
| 76 h | MSB/MVTS customers | Do not have this category of customer or industry |
| 76 i | Non-account customers | Do not have this category of customer or industry |
| | | |
| 76) | Non-Government Organisations | Do not have this category of customer or industry |
| 76 k | Non-resident customers | Picase select |
| 761 | Nuclear power | Do not have this category of customer or industry |
| 76 m | Payment Service Providers | Do not have this category of customer or industry |
| 76 n | PEPs | Do not have this category of customer or industry |
| 76 0 | PEP Close Associates | Please select |
| 76 p | PEP Related | Please select |
| 76 q | Precious metals and stones | Do not have this category of customer or industry |
| 76 r | Red light businesses/Adult entertainment | Do not have this calegory of customer or industry |
| 76 s | Regulated charities | Do not have this category of customer or industry |
| 76 t | Shell banks | Do not have this calegory of customer or industry |
| 76 u | Travel and Tour Companies | Pisase select |
| 76 v | Unregulated charities | Do not have this category of customer or industry |
| 76 w | Used Car Dealers | Do not have this category of customer or industry |
| 76 x | Virtual Asset Service Providers | Do not have this category of customer or industry |
| 76 y | Other (specify) | A MAY MAY A MARKANY AL ANG MAY AN ANG MARKANYA AL INA MARKANYA |
| 77 | If restricted, provide details of the restriction | |
| ι. | | |

| 78 a | If Y indicate who provides the approval: | Please select |
|----------------|---|---|
| 79 | Does the Entity have specific procedures for | |
| E. C. | onboarding entities that handle client money such as | No |
| 100 | lawyers, accountants, consultants, real estate agents? | |
| 80 | Does the Entity perform an additional control or | |
| | quality review on clients subject to EDD? | Please select |
| | 7 | |
| 81 | Confirm that all responses provided in the above | Please select |
| | Section are representative of all the LE's branches | Flease seleck |
| 81 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to | |
| I State | | |
| 2. 11. 2. | | |
| | | |
| 82 | If appropriate, provide any additional | We identify beneficial owners according to the requirements of French legislation. |
| C. Links | information/context to the answers in this section. | |
| | | |
| 100 | | |
| | | |
| 8. MONII | ORING & REPORTING | |
| 83 | Does the Entity have risk based policies, procedures | |
| | and monitoring processes for the identification and | Please select |
| 800 S.M. | reporting of suspicious activity? | |
| | | |
| | What is the method used by the Entity to monitor | |
| 84 | transactions for suspicious activities? | Please select |
| - | | |
| 84 a | If manual or combination selected, specify what | |
| 2 (5 (1)) | type of transactions are monitored manually | |
| NSST C X | | |
| 16.000 | | |
| | Management of the second | |
| 046 | If automated or combination selected, are internal | Please select |
| 84 b | system or vendor-sourced tools used? | |
| 84 b1 | If 'Vendor-sourced tool' or 'Both' selected, what is | Deterred (MTC |
| 04 01 | the name of the vendor/tool? | Datamart / MTS |
| 1 | | Sole in the second of the state of the second se |
| 1122 | | |
| 21.21.2 | | |
| 84 b2 | When was the tool last updated? | Other - Please explain (in Question 91) |
| 04 02 | When was the tool last updated i | Oulei - Flease explain (in Quescon er) |
| 84 b3 | When was the automated Transaction Monitoring | |
| 04.05 | application last calibrated? | Please select |
| | epp. cover, not constant - | |
| 85 | Does the Entity have regulatory requirements to | |
| 00 | report suspicious transactions? | Please select |
| | | |
| 85 a | If Y, does the Entity have policies, procedures and | |
| 00 4 | processes to comply with suspicious transaction | Please select |
| | reporting requirements? | |
| | roporting roducementer. | |
| 20 | Dave the Estituteus collision, exceedures and | |
| 86 | Does the Entity have policies, procedures and | Please select |
| De lui S | processes to review and escalate matters arising from | Please select |
| 1 | the monitoring of customer transactions and activity? | |
| | | |
| 87 | Does the Entity have a data quality management | |
| 2010 | programme to ensure that complete data for all | Please select |
| | transactions are subject to monitoring? | |
| | Deve the Catile have an energy in along to managed | |
| 88 | Does the Entity have processes in place to respond | |
| | to Request For Information (RFIs) from other entities | Please select |
| The part of | in a timely manner? | The second s |
| 89 | Does the Entity have processes in place to send | |
| | Requests for Information (RFIs) to their customers in | Please select |
| 1217 | a timely manner? | |
| | | |
| 90 | Confirm that all responses provided in the above | Please select |
| | Section are representative of all the LE's branches | |
| 90 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to | |
| | | |
| | | |
| | | |
| 91 | If appropriate, provide any additional | Tools are maintained and updated by from the parent Company |
| | information/context to the answers in this section. | |
| | | |
| | Testini none second della presi anti- titi | |
| 9 PAVAR | ENT TRANSPARENCY | |
| 9. PATMI 92 | | |
| 32 | Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? | Please select |
| | rayment Hansparency Standards? | |

| 93 | Does the Enlity have policies, procedures and | |
|----------|--|---------------|
| 93 | processes to comply with and have controls in place to ensure compliance with: | |
| 93 a | FATF Recommendation 16 | Please select |
| 93 b | Local Regulations | Please select |
| 93 b1 | If Y, specify the regulation | |
| 93 c | lf N, explain | |
| 94 | Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages? | Please select |
| 95 | Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages? | Please select |
| 95 a | If Y, does the Entity have procedures to include beneficiary address including country in cross border payments? | Please select |
| 96 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 96 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 97 | If appropriate, provide any additional information/context to the answers in this section. | |
| 10. SANC | | |
| 98 | Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? | Please select |
| 99 | Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)? | Please select |
| 100 | Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? | Please select |
| 101 | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? | Please select |
| 102 | What is the method used by the Entity for sanctions screening? | Please select |
| 102 a | If 'automated' or 'both automated and manual' selected: | |
| 102 a1 | Are internal system of vendor-sourced tools used? | Please select |
| 102 a1a | If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? | |
| 102 a2 | When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110) | Please select |
| 103 | Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? | Piease select |
| 104 | What is the method used by the Entity? | Please select |

| 105 | Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening? | Please select |
|----------------|--|-----------------------------|
| 106 | Select the Sanctions Lists used by the Entity in its sanctions screening processes: | |
| 106 a | Consolidated United Nations Security Council Sanctions List (UN) | Please select |
| 106 b | United States Department of the Treasury's Office of Foreign Assets Control (OFAC) | Please select |
| 106 c | Office of Financial Sanctions Implementation HMT (OFSI) | Please select |
| 106 d | European Union Consolidated List (EU) | Please select |
| 106 e | Lists maintained by other G7 member countries | Please select |
| 106 f | Other (specify) | |
| 107 | When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against: | |
| 107 a | Customer Data | Please select |
| 107 b | Transactions | Please select |
| 108 | Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions? | Please select |
| 109 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 109 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 110 | If appropriate, provide any additional information/context to the answers in this section. | |
| | NG & EDUCATION | |
| 111 | Does the Entity provide mandatory training, which Includes: | |
| 111 a | Identification and reporting of transactions to government authorities | Please select |
| 111 b | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered | Please select |
| 111 c | Internal policies for controlling money laundering, terrorist financing and sanctions violations | Please select |
| 111 d | New issues that occur in the market, e.g. significant regulatory actions or new regulations | Please select |
| 111 e | Conduct and Culture | Please select |
| 111 f | Fraud | Please select |
| 112 | Is the above mandatory training provided to: | |
| 112 a | Board and Senior Committee Management | Please select |
| 112 b | 1st Line of Defence | Please select |
| 112 c 112 d | 2nd Line of Defence 3rd Line of Defence | Please select |
| 112 a | Third parties to which specific FCC activities have been outsourced | Please select Please select |
| 112 f | Non-employed workers (contractors/consultants) | Please select |
| 113 | Does the Enlity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities? | |
| 114 | Does the Entity provide customised training for AML, CTF and Sanctions staff? | Please select |
| 114 a | If Y, how frequently is training delivered? | Please select |
| 115 | Confirm that all responses provided in the above | Please select |
| | Section are representative of all the LE's branches | i hudo dolovi |

| 115 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
|----------------|--|-----------------------------|
| 116 | If appropriate, provide any additional information/context to the answers in this section. | |
| 12 0141 | TY ASSURANCE (COMPLIANCE TESTING | |
| 117 | Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)? | Please select |
| 118 | Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)? | Please select |
| 119 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Please select |
| 119 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 120 | If appropriate, provide any additional information/context to the answers in this section. | |
| 13. AUDIT | | |
| 121 | In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? | Please select |
| 122 | How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: | |
| 122 a | Internal Audit Department | Please select |
| 122 b | External Third Party | Please select |
| 123 | Does the internal audit function or other independent third party cover the following areas: | |
| 123 a | AML, CTF, ABC, Fraud and Sanctions policy and procedures | Please select |
| 123 b | Enterprise Wide Risk Assessment | Please select |
| 123 c 123 d | Governance KYC/CDD/EDD and underlying methodologies | Please select Please select |
| 123 e | Name Screening & List Management | Please select |
| 123 f | Reporting/Metrics & Management Information | Please select |
| 123 g | Suspicious Activity Filing | Please select |
| 123 h | Technology | Please select |
| 123 | Transaction Monitoring | Please select |
| 123 j 123 k | Transaction Screening including for sanctions Training & Education | Please select Please select |
| 1231 | Other (specify) | Firease select |
| 124 | Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? | Please select |
| 125 | Confirm that all responses provided in the above section are representative of all the LE's branches | Please select |
| 125 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 126 | If appropriate, provide any additional information/context to the answers in this section. | |
| 14. FRAL | | |
| 127 | Does the Entity have policies in place addressing fraud risk? | Please select |
| 128 | Does the Entity have a dedicated team responsible for preventing & detecting fraud? | Please select |
| | | |

| 129 | Does the Entity have real time monitoring to detect fraud? | Please select |
|--|---|---|
| 130 | Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID? | Please select |
| 131 | Confirm that all responses provided in the above section are representative of all the LE's branches | Please select |
| 131 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 132 | If appropriate, provide any additional information/context to the answers in this section. | |
| Anti- Money Banco Bilba every effort | Laundering, Chief Compliance Officer, Global Head of Financial ao Vizcaya Argentaria S.A (Financial Institut to remain in full compliance with all applicable financial crime law | king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Grimes Compliance OR equivalent) ion name) is fully committed to the fight against financial crime and makes s, regulations and standards in all of the jurisdictions in which it does business and holds accounts. we and sustainable controls to combat financial crime in order to protect its reputation and to meet its |
| legal and reg | gulatory obligations. | ng parties to transactions in international payments and has adopted/is committed to adopting these |
| | al Institution further certifies it complies with / is working to comp tion provided in this Wolfsberg CBDDQ will be kept current and v | y with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. will be updated no less frequently than every eighteen months. |
| The Financia | al Institution commits to file accurate supplemental information or | n a timely basis. |
| I, the answers Institution. | | of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that my honest belief, and that I am authorised to execute this declaration on behalf of the Financial |
| Luis Lóc | ez González (MLRO or equ | ivalent), certify that I have read and understood this declaration, that the answers provided in this |
| | | arm authorised to execute this declaration on behalf of the Financial Institution. |
| 12/12/2023 | 3 Signature & Da | le) |
| | (Signature & Da | (e) |
| | (0900000000 | |
| | and the second se | |

the Wolfsberg Group

Financial Institution Name: Location (Country) :

| | No# | Question | Answer |
|-----|--------|--|--------|
| 1. | ENTITY | & OWNERSHIP | |
| 1 | | Full Legal Name | |
| 1 | | Tuli Legar Name | |
| | | | |
| | | | |
| | | | |
| 2 | | Append a list of foreign branches which are covered | |
| | | by this questionnaire | |
| | | | |
| | | | |
| | | | |
| 3 | | Full Legal (Registered) Address | |
| | | | |
| | | | |
| | | | |
| _ | | | |
| 4 | | Full Primary Business Address (if different from | |
| | | above) | |
| | | | |
| | | | |
| 5 | | Date of Entity incorporation/establishment | |
| 5 | | Bate of Entry moorporation/establishinent | |
| | | | |
| | | | |
| | | | |
| 6 | | Select type of ownership and append an ownership | |
| | | chart if available | |
| 6 8 | 9 | Publicly Traded (25% of shares publicly traded) | |
| | | If Y, indicate the exchange traded on and ticker | |
| 6 | a I | | |
| | | symbol | |
| | | | |
| | | | |
| 6 | h | Member Owned/Mutual | |
| 6 | | Government or State Owned by 25% or more | |
| 6 | | Privately Owned | |
| | | | |
| 6 | a1 | If Y, provide details of shareholders or ultimate | |
| | | beneficial owners with a holding of 10% or more | |
| | | | |
| | | | |
| 7 | | % of the Entity's total shares composed of bearer | |
| - | | shares | |
| | | 310103 | |
| | | | |
| | | | |
| 8 | | Does the Entity, or any of its branches, operate under | |
| | | an Offshore Banking License (OBL)? | |
| 8 ; | 9 | If Y, provide the name of the relevant branch/es | |
| - | - | which operate under an OBL | |
| | | | |
| | | | |
| | | | |
| 9 | | Does the Bank have a Virtual Bank License or | |
| | | provide services only through online channels? | |
| 10 |) | Name of primary financial regulator/supervisory | |
| | | authority | |
| | | | |
| | | | |
| | | | |
| 11 | | Provide Legal Entity Identifier (LEI) if available | |
| | | | |
| | | | |
| | | | |
| 4.5 | | | |
| 12 | | Provide the full legal name of the ultimate parent (if | |
| | | different from the Entity completing the DDQ) | |
| | | | |
| | | | |
| | | | |

| 40 | Installed a construction of the second second second states of | |
|-----------|--|--|
| 13 | Jurisdiction of licensing authority and regulator of | |
| | ultimate parent | |
| | | |
| | | |
| | | |
| | | |
| 14 | Select the business areas applicable to the Entity | |
| 14 a | Retail Banking | |
| 14 b | Private Banking | |
| | | |
| 14 c | Commercial Banking | |
| 14 d | Transactional Banking | |
| | <u> </u> | |
| 14 e | Investment Banking | |
| 14 f | Financial Markets Trading | |
| | , and the second s | |
| 14 g | Securities Services/Custody | |
| 14 h | Broker/Dealer | |
| 14 i | Multilateral Development Bank | |
| | • | |
| 14 j | Wealth Management | |
| 14 k | Other (please explain) | |
| 14 K | Otilei (piease explain) | |
| | | |
| | | |
| | | |
| | | |
| 15 | Does the Entity have a significant (10% or more) | |
| 15 | | |
| | portfolio of non-resident customers or does it derive | |
| | more than 10% of its revenue from non-resident | |
| 1 | customers? (Non-resident means customers primarily | |
| 1 | | |
| | resident in a different jurisdiction to the location | |
| 1 | where bank services are provided) | |
| 1 | . , | |
| 15 a | If Y, provide the top five countries where the non- | |
| 15 4 | | |
| | resident customers are located. | |
| | | |
| | | |
| | | |
| 16 | Select the closest value: | |
| | | |
| 16 a | Number of employees | |
| 16 b | Total Assets | |
| | | |
| 17 | Confirm that all responses provided in the above | |
| | Section are representative of all the LE's branches. | |
| 17 a | If N algorify which guagations the difference (a relate to | |
| 17 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to. | |
| | | |
| | | |
| | | |
| 10 | | |
| 18 | If appropriate, provide any additional | |
| | information/context to the answers in this section. | |
| | | |
| | | |
| | | |
| | | |
| 2. PRODUC | CTS & SERVICES | |
| 19 | Does the Entity offer the following products and | |
| | services: | |
| | | |
| 19 a | Correspondent Banking | |
| 19 a1 | IfY | |
| | | |
| 19 a1a | Does the Entity offer Correspondent Banking | |
| | services to domestic banks? | |
| | | |
| 19 a1b | Does the Entity allow domestic bank clients to | |
| 1 | provide downstream relationships? | |
| 40.4 | | |
| 19 a1c | Does the Entity have processes and procedures | |
| | in place to identify downstream relationships with | |
| | domestic banks? | |
| | | |
| 19 a1d | Does the Entity offer Correspondent Banking | |
| | services to foreign banks? | |
| L | Ĵ | |
| 19 a1e | Does the Entity allow downstream relationships | |
| | with foreign banks? | |
| | <u> </u> | |
| 19 a1f | Does the Entity have processes and procedures | |
| | in place to identify downstream relationships with | |
| | | |
| | foreign banks? | |
| 19 a1g | Does the Entity offer Correspondent Banking | |
| Jany | | |
| 1 | services to regulated Money Services Businesses | |
| 1 | (MSBs)/Money Value Transfer Services (MVTSs)? | |
| 10 - 11 | | |
| 19 a1h | Does the Entity allow downstream relationships | |
| | with MSBs, MVTSs, or Payment Service Provider | |
| | (PSPs)? | |
| L | | |
| 19 a1h1 | MSBs | |
| 19 a1h2 | | |
| | MVTSs | |
| 19 a1h3 | PSPs | |

| 19 a1i | Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs? | |
|--|---|--|
| 19 b | Cross-Border Bulk Cash Delivery | |
| 19 c | Cross-Border Remittances | |
| 19 c 19 d | Domestic Bulk Cash Delivery | |
| | | |
| 19 e | Hold Mail | |
| 19 f | International Cash Letter | |
| 19 g | Low Price Securities | |
| 19 h | Payable Through Accounts | |
| 19 i | Payment services to non-bank entities who may | |
| 101 | then offer third party payment services to their customers? | |
| 19 i1 | If Y, please select all that apply below? | |
| 19 i2 | Third Party Payment Service Providers | |
| 19 i3 | Virtual Asset Service Providers (VASPs) | |
| 19 i4 | eCommerce Platforms | |
| - | | |
| 19 i5 | Other - Please explain | |
| 19 j | Private Banking | |
| 19 k | Remote Deposit Capture (RDC) | |
| 19 I | Sponsoring Private ATMs | |
| 19 m | Stored Value Instruments | |
| 19 m | Trade Finance | |
| 19 0 | Virtual Assets | |
| | | |
| 19 p | For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence: | |
| 19 p1 | Check cashing service | |
| 19 p1a | If yes, state the applicable level of due diligence | |
| 19 p2 | Wire transfers | |
| 19 p2a | If yes, state the applicable level of due diligence | |
| 19 p2a 19 p3 | | |
| | Foreign currency conversion | |
| 19 p3a | If yes, state the applicable level of due diligence | |
| 19 p4 | Sale of Monetary Instruments | |
| 19 p4a | If yes, state the applicable level of due diligence | |
| | | |
| 19 p5 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. | |
| | If you offer other services to walk-in customers please provide more detail here, including | |
| 19 p5 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by | |
| 19 p5 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above | |
| 19 p5 19 q 20 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to | |
| 19 p5 19 q 20 20 a 21 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. | |
| 19 p5 19 q 20 20 a 21 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the | |
| 19 p5 19 q 20 20 a 21 3. AML, C1 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum | |
| 19 p5 19 q 20 20 a 21 3. AML, C1 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the | |
| 19 p5 19 q 20 20 a 21 3. AML, C1 22 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise | |
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| 19 p5 19 p5 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership | |
| 19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 c 22 d | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting | |
| 19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 c 22 c 22 c 22 c | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD | |
| 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c 22 c 22 c 22 c 22 c 22 c 22 c 22 c | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting | |
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| 19 p5 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 z 22 z 22 d 22 c 22 d 22 c 22 d 22 c 22 d 22 c 22 d 22 d | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review | |
| 19 p5 19 p5 19 q 20 20 a 21 22 a 22 a 22 a 22 c 22 c | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures | |
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| 19 p5 19 p5 19 q 20 a 20 a 21 a 22 a 22 a 22 b 22 c 22 d 22 c 22 d 22 c 22 d 22 g 22 h 22 i 22 j 22 k | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment | |
| 19 p5 19 p5 19 q 20 20 a 20 a 21 22 a 22 a 22 b 22 c 22 c 22 d 22 c 22 c 22 f 22 g 22 h 22 j 22 j | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening | |

| 22 m | Suspicious Activity Reporting | |
|-----------|---|--|
| 22 n | Training and Education | |
| 22 o | Transaction Monitoring | |
| 23 | How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? | |
| 24 | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29. | |
| 25 | Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme? | |
| 26 | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? | |
| 26 a | If Y, provide further details | |
| 27 | Does the entity have a whistleblower policy? | |
| 28 | Confirm that all responses provided in the above Section are representative of all the LE's branches | |
| 28 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 29 | If appropriate, provide any additional information/context to the answers in this section. | |
| 4. ANTI E | RIBERY & CORRUPTION | |
| 30 | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? | |
| 31 | Does the Entity have an enterprise wide programme that sets minimum ABC standards? | |
| 32 | Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? | |
| 33 | Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? | |
| 34 | Is the Entity's ABC programme applicable to: | |
| 35 | Does the Entity have a global ABC policy that: | |
| 35 a | Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage. | |
| 35 b | Includes enhanced requirements regarding interaction with public officials? | |
| 35 c | Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? | |
| 36 | Does the Entity have controls in place to monitor the effectiveness of their ABC programme? | |
| 37 | Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? | |
| 38 | Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? | |
| 38 a | If N, provide the date when the last ABC EWRA was completed. | |
| 39 | Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? | |
| 40 | Does the Entity's ABC EWRA cover the inherent risk components detailed below: | |
| 40 a | Potential liability created by intermediaries and other third-party providers as appropriate | |

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

| 49 i | Define the process for escalating financial crime risk issues/potentially suspicious activity identified by | |
|--|---|--|
| | employees | |
| 49 j | Define the process, where appropriate, for | |
| - | terminating existing customer relationships due to financial crime risk | |
| 49 k | Define the process for exiting clients for financial | |
| | crime reasons that applies across the entity, including foreign branches and affiliates | |
| 49 I | Define the process and controls to identify and | |
| | handle customers that were previously exited for | |
| | financial crime reasons if they seek to re-establish a relationship | |
| 49 m | Outline the processes regarding screening for | |
| | sanctions, PEPs and Adverse Media/Negative News | |
| 49 n | Outline the processes for the maintenance of internal "watchlists" | |
| 50 | Has the Entity defined a risk tolerance statement or | |
| | similar document which defines a risk boundary around their business? | |
| 51 | Does the Entity have record retention procedures that | |
| • | comply with applicable laws? | |
| 51 a | If Y, what is the retention period? | |
| | | |
| | | |
| 52 | Confirm that all means any ideal in the above | |
| 32 | Confirm that all responses provided in the above Section are representative of all the LE's branches | |
| 52 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to. | |
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| | | |
| 53 | If appropriate, provide any additional information/context to the answers in this section. | |
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| 6. AML. CTF | & SANCTIONS RISK ASSESSMENT | |
| 6. AML, CTF 54 | & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the | |
| 54 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: | |
| 54 54 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client | |
| 54 54 a 54 b | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product | |
| 54 a 54 b 54 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel | |
| 54 a 54 b 54 c 54 d | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography | |
| 54 a 54 b 54 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel | |
| 54 a 54 b 54 c 54 d 55 55 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring | |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 b | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence | |
| 54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification | |
| 54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c 55 c 55 d | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening | |
| 54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification | |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education | |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance | |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information | |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance | |
| 54 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 d 55 d 55 d 55 d 55 d 55 f 55 g 55 h 56 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? | |
| 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed | |
| 54 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 d 55 d 55 d 55 d 55 d 55 f 55 g 55 h 56 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF | |
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| 54 54 a 54 b 54 c 55 a 55 a 55 b 55 c 55 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent | |
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| 54 54 a 54 b 54 c 54 d 55 a 55 a 55 a 55 c 55 c 57 c 57 c 57 c 57 c 57 c 57 c | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product | |
| 54 54 a 54 b 54 c 54 d 55 55 b 55 c 55 d 55 c 55 d 55 d 55 d 55 f 55 g 55 h 56 57 57 a 57 c 57 d 58 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | |
| 54 54 a 54 b 54 c 55 a 55 b 55 b 55 c 55 c 55 d 55 c 55 d 55 f 55 f 55 h 56 57 57 a 57 d 57 d 58 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | |
| 54 54 a 54 b 54 c 55 a 55 b 55 c 55 c 55 d 55 c 55 d 55 f 55 g 55 h 56 a 57 c 57 d 58 a 58 b | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance | |
| 54 54 a 54 b 54 d 55 a 55 b 55 c 55 d 55 c 55 d 55 f 55 f 55 h 56 57 57 a 57 d 57 d 58 58 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | |

| 58 e | Name Careening | |
|----------------|---|--|
| 58 f | Name Screening | |
| 58 f 58 g | Transaction Screening Training and Education | |
| 58 g 59 | Has the Entity's Sanctions EWRA been completed in the last 12 months? | |
| 50 - | | |
| 59 a | If N, provide the date when the last Sanctions EWRA was completed. | |
| 60 | Confirm that all responses provided in the above Section are representative of all the LE's branches | |
| 60 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to. | |
| 61 | If appropriate, provide any additional information/context to the answers in this section. | |
| 7. KYC, C | DD and EDD | |
| 62 | Does the Entity verify the identity of the customer? | |
| 63 | Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days? | |
| 64 | Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: | |
| 64 a | Customer identification | |
| 64 b | Expected activity | |
| 64 c | Nature of business/employment | |
| 64 d | Ownership structure | |
| 64 e | Product usage | |
| 64 f | Purpose and nature of relationship Source of funds | |
| 64 g 64 h | Source of runds Source of wealth | |
| 65 | Are each of the following identified: | |
| 65 a | Ultimate beneficial ownership | |
| 65 a1 | Are ultimate beneficial owners verified? | |
| 65 b | Authorised signatories (where applicable) | |
| 65 c | Key controllers | |
| 65 d | Other relevant parties | |
| 66 | What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? | |
| 67 | Does the due diligence process result in customers receiving a risk classification? | |
| 67 a | If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: | |
| 67 a1 | Product Usage | |
| 67 a2 67 a3 | Geography | |
| 67 a3 67 a4 | Business Type/Industry Legal Entity type | |
| 67 a4 | Adverse Information | |
| 67 a6 | Other (specify) | |
| 68 | For high risk non-individual customers, is a site visit a part of your KYC process? | |
| 68 a | If Y, is this at: | |
| 68 a1 | Onboarding | |
| 68 a2 | KYC renewal | |
| 68 a3 68 a4 | Trigger event Other | |
| 68 a4a | If yes, please specify "Other" | |
| 69 | Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? | |
| 69 a | If Y, is this at: | |
| 69 a1 | Onboarding | |
| 69 a2 | KYC renewal | |

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

| 78 a | If Y indicate who provides the approval: | |
|-----------|---|--|
| 79 | Does the Entity have specific procedures for | |
| | onboarding entities that handle client money such as | |
| | lawyers, accountants, consultants, real estate agents? | |
| 80 | Does the Entity perform an additional control or quality review on clients subject to EDD? | |
| 81 | Confirm that all responses provided in the above Section are representative of all the LE's branches | |
| 81 a | If N, clarify which questions the difference/s relate to | |
| 01 a | and the branch/es that this applies to | |
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| 82 | If appropriate, provide any additional information/context to the answers in this section. | |
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| | | |
| 8. MONITO | DRING & REPORTING | |
| 83 | Does the Entity have risk based policies, procedures | |
| | and monitoring processes for the identification and | |
| | reporting of suspicious activity? | |
| 04 | What is the method used by the Entity to monitor | |
| 84 | transactions for suspicious activities? | |
| <u> </u> | | |
| 84 a | If manual or combination selected, specify what | |
| | type of transactions are monitored manually | |
| | | |
| | | |
| 84 b | If automated or combination selected, are internal system or vendor-sourced tools used? | |
| | | |
| 84 b1 | If 'Vendor-sourced tool' or 'Both' selected, what is | |
| | the name of the vendor/tool? | |
| | | |
| | | |
| 84 b2 | When was the tool last updated? | |
| 04 62 | When was the outemated Transaction Manitaring | |
| 84 b3 | When was the automated Transaction Monitoring application last calibrated? | |
| | | |
| 85 | Does the Entity have regulatory requirements to | |
| | report suspicious transactions? | |
| 85 a | If Y, does the Entity have policies, procedures and | |
| 05 a | processes to comply with suspicious transaction | |
| | reporting requirements? | |
| - | | |
| 86 | Does the Entity have policies, procedures and | |
| | processes to review and escalate matters arising from | |
| | the monitoring of customer transactions and activity? | |
| 87 | Does the Entity have a data quality management | |
| -· | programme to ensure that complete data for all | |
| | transactions are subject to monitoring? | |
| | Deep the Entity have processes in place to reason it | |
| 88 | Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities | |
| | in a timely manner? | |
| | | |
| 89 | Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in | |
| | a timely manner? | |
| 90 | Confirm that all responses provided in the above | |
| | Section are representative of all the LE's branches | |
| 90 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to | |
| | | |
| | | |
| 91 | If appropriate, provide any additional | |
| | information/context to the answers in this section. | |
| | | |
| | | |
| 9. PAYME | NT TRANSPARENCY | |
| 92 | Does the Entity adhere to the Wolfsberg Group | |
| 1 | Payment Transparency Standards? | |

| 93 | Does the Entity have policies, procedures and | |
|----------|--|--|
| 55 | | |
| | processes to comply with and have controls in place | |
| | to ensure compliance with: | |
| 93 a | FATF Recommendation 16 | |
| 93 b | Local Regulations | |
| 93 b1 | If Y, specify the regulation | |
| 55 51 | | |
| 93 c | If N, explain | |
| | | |
| 94 | Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages? | |
| 95 | Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages? | |
| 95 a | If Y, does the Entity have procedures to include beneficiary address including country in cross border payments? | |
| 96 | Confirm that all responses provided in the above Section are representative of all the LE's branches | |
| 96 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 97 | If appropriate, provide any additional information/context to the answers in this section. | |
| 10. SANC | TIONS | |
| 98 | Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? | |
| 99 | Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)? | |
| 100 | Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? | |
| 101 | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? | |
| 102 | What is the method used by the Entity for sanctions screening? | |
| 102 a | If 'automated' or 'both automated and manual' selected: | |
| 102 a1 | Are internal system of vendor-sourced tools used? | |
| 102 a1a | If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? | |
| 102 a2 | When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110) | |
| 103 | Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? | |
| 104 | What is the method used by the Entity? | |

| | - | |
|-------|--|--|
| 105 | Does the Entity have a data quality management | |
| | programme to ensure that complete data for all | |
| | transactions are subject to sanctions screening? | |
| | | |
| 106 | Select the Sanctions Lists used by the Entity in its | |
| | sanctions screening processes: | |
| 106 a | Consolidated United Nations Security Council | |
| 100 u | Sanctions List (UN) | |
| | | |
| 106 b | United States Department of the Treasury's Office of | |
| | Foreign Assets Control (OFAC) | |
| 106 c | Office of Financial Sanctions Implementation HMT | |
| | (OFSI) | |
| | | |
| 106 d | European Union Consolidated List (EU) | |
| 106 e | Lists maintained by other G7 member countries | |
| 106 f | Other (specify) | |
| | (| |
| | | |
| | | |
| | | |
| 107 | When regulatory authorities make updates to their | |
| 101 | Sanctions list, how many business days before the | |
| | | |
| | entity updates their active manual and/or automated | |
| | screening systems against: | |
| 107 a | Customer Data | |
| 107 b | Transactions | |
| 107 5 | | |
| 100 | Does the Entity have a physical presence, e.g. | |
| | branches, subsidiaries, or representative offices | |
| | located in countries/regions against which UN, OFAC, | |
| | OFSI, EU or G7 member countries have enacted | |
| | comprehensive jurisdiction-based Sanctions? | |
| 109 | Confirm that all responses provided in the above | |
| 100 | Section are representative of all the LE's branches | |
| 100 | | |
| 109 a | If N, clarify which questions the difference/s relate to | |
| | and the branch/es that this applies to. | |
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| 110 | lf annun viete, mussiale en verdeltienel | |
| 110 | If appropriate, provide any additional | |
| | information/context to the answers in this section. | |
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| | | |
| | G & EDUCATION | |
| 111 | Does the Entity provide mandatory training, which | |
| | includes: | |
| 111 a | Identification and reporting of transactions to | |
| | government authorities | |
| 111 b | Examples of different forms of money laundering, | |
| | terrorist financing and sanctions violations relevant | |
| | for the types of products and services offered | |
| | for the types of products and services offered | |
| | | |
| 111 c | Internal policies for controlling money laundering, | |
| | terrorist financing and sanctions violations | |
| 111 d | New issues that occur in the market, e.g. significant | |
| | regulatory actions or new regulations | |
| | | |
| 111 e | Conduct and Culture | |
| 111 f | Fraud | |
| 112 | Is the above mandatory training provided to: | |
| 112 a | Board and Senior Committee Management | |
| 112 b | 1st Line of Defence | |
| | 2nd Line of Defence | |
| 112 c | | |
| 112 d | 3rd Line of Defence | |
| 112 e | Third parties to which specific FCC activities have | |
| | been outsourced | |
| 112 f | Non-employed workers (contractors/consultants) | |
| 1121 | | |
| 113 | Does the Entity provide AML, CTF & Sanctions training | |
| | that is targeted to specific roles, responsibilities and | |
| | high-risk products, services and activities? | |
| 114 | Does the Entity provide customised training for AML, | |
| | CTF and Sanctions staff? | |
| 114 a | If Y, how frequently is training delivered? | |
| 115 | Confirm that all responses provided in the above | |
| | Section are representative of all the LE's branches | |
| | | |

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

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