Wolfsborg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ) VI.4

the Wolfsberg Group

Financial Institution Name: Location (Country) : BANCO BILBAO VIZCAYA 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
, ENTITY	Y & OWNERSHIP	
	Full Legal Name	BANCO BILBAO VIZCAYA ARGENTARIA S.A.
2	Append a list of foreign branches which are covered by this questionnaire	United Kingdom, Germany, Belgium, United States, Taiwan, South Korea, France, Hong, Kong, Italy, Japan, Singapore, Portugal, China.
3	Full Legal (Registered) Address	Plaza de San Nicolás, 4, 48005 – Bilbao
4	Full Primary Business Address (if different from above)	Calle Azul, 4, 28050, Madrid
5	Date of Entity incorporation/establishment	Founded in 1857
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	BBVA:SM Madrid, Barcelona, Bilbao, Valencia, London, Mexico, New York.
6 b	Member Owned/Mulual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	0%
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Name of primary financial regulator/supervisory authority	BANCO DE ESPAÑA
11	Provide Legal Entity Identifier (LEI) if available	K8MS7FD7N5Z2WQ51AZ71
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	None

A)

3	Jurisdiction of licensing authority and regulator of ultimate parent	SPAIN
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b	Private Banking	Yes
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
	Securities Services/Custody	Yes
14 g		Yes
14 h	Broker/Dealer	
14 i	Multilateral Development Bank	No
14 j	Wealth Management	Yes
14 k	Olher (please explain)	
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	No
15 a	If Y, provide the top five countries where the non- resident customers are located,	
16	Select the closest value:	
16 a	Number of employees	10001+
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	No
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Please see annexes for all branches
18	If appropriate, provide any additional information/context to the answers in this section.	
2. PRODU	JCTS & SERVICES	
19	Does the Entity offer the following products and	
10	services:	
19 a	Correspondent Banking	Yes
19 a1	If Y	
	Does the Entity offer Correspondent Banking	
19 a1a	services to domestic banks?	Yes
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	Yes
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Yes
19 a1e	Does the Entity allow downstream relationships with foreign banks?	Yes
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Yes
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	Yes
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	No
19 a1h1	MVTSs	No
	PSPs	No
19 a1h3	TUTO	1377

19 b 19 c 19 d	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs IMVTSs/PSPs?	Yes
19 c 19 d	Cross-Border Bulk Cash Delivery	No
	Cross-Border Remittances	Yes
	Domestic Bulk Cash Delivery	No
0 0	Hold Mail	Yes
19 f	International Cash Letter	Yes
19 g		No
-	2011 1 1112	No
19 h	, a)ana imagani	NO
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	Yes
19 i1	If Y, please select all that apply below?	
19 12		Yes
19 i3	Virtual Asset Service Providers (VASPs)	Yes
19 14	eCommerce Platforms	Yes
19 14	Other - Please explain	100
19 15	Olitei - Fiease expiani	
10 i	Private Banking	Both
19 j		No
19 k	Remote Deposit Capture (RDC)	1977
191	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	Yes
19 n	Trade Finance	Yes
19 o	Virtual Assets	Yes
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	Yes
19 p1a	If yes, state the applicable level of due diligence	Identification and verification
19 p2	Wire transfers	Yes
	If yes, state the applicable level of due diligence	Identification and verification
19 p2a		Yes
19 p3	Foreign currency conversion	Identification and verification
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	Yes Identification and verification
19 p4a 19 p5	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.	BBVA accepts non account customers, as it acts as receiver for Tax and Social Security and othe Spenish authorities, and clients can walk in and pay their duties. BBVA has no appetite for other type of walk-in customers. In the mentioned cases, the bank duly identifies the customers according to Spanish and European best practices.
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	No
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Please see annexes for all branches
21	If appropriate, provide any additional information/context to the answers in this section.	Clarification #190: BBVA S.A. will offer the following cryptoasset services exclusively to retail customers in 2025; (i) buy/sell (ii) custody and (iii) outgoing transfers of bitcoin and ethereum in cases where legally required (i.e. customer transfers, wills, dissolution of matrimonial property regimes, seizures, etc.). BBVA S.A. does not offer any type of advice or recommendation on any crypto-asset. The services indicated are provided at the sole initiative of the clients.
	CTF & SANCTIONS PROGRAMME	
3. AML.	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
3. AML, 0 22		Yes
22	Appointed Officer with sufficient experience/expertise	1.12
22 22 a	Appointed Officer with sufficient experience/expertise Adverse Information Screening	Yes
22 a 22 b		
22 a 22 b 22 c	Adverse Information Screening Beneficial Ownership	Yes
22 a 22 b 22 c 22 d	Adverse Information Screening Beneficial Ownership Cash Reporting	Yes Yes Yes
22 a 22 b 22 c 22 d 22 e	Adverse Information Screening Beneficial Ownership Cash Reporting CDD	Yes Yes Yes Yes Yes
22 a 22 b 22 c 22 d 22 e 22 f	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	Yes Yes Yes Yes Yes Yes Yes
22 a 22 b 22 c 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 Yes Yes
22 a 22 b 22 c 22 d 22 e 22 f	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Yes Yes Yes Yes Yes Yes Yes Yes Yes
22 a 22 b 22 c 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 Yes Yes
22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 l	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Yes Yes Yes Yes Yes Yes Yes Yes Yes
22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes

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22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	101-500
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	No
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes
26 a	If Y, provide further details	Only one company 100% owned by the group, for back office and administrative tasks
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
28 a	If N, clarify which questions the difference/s relate to and the 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 policies reviewed on an ongoing basis. Not necessarily every year, but some with a higher frequency. Approved at the level required by internal governance
4 ANIT	I BRIBERY & CORRUPTION	
4. ANT	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 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
36	Does the Enlity 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 Assessmen (EWRA) been completed in the last 12 months?	¹ Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
10 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
10 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Yes
42 f	Non-employed workers as appropriate (contractors/consultants)	Yes
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
5. AML,	If appropriate, provide any additional information/context to the answers in this section. CTF & SANCTIONS POLICIES & PROCEDURES Has the Entity documented policies and procedures consistent with applicable AML CTF & Sanctions	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.
45 5. AML, 46	information/context to the answers in this section. CTF & SANCTIONS POLICIES & PROCEDURES	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
5. AML, 46	information/context to the answers in this section. CTF & SANCTIONS POLICIES & PROCEDURES Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent,	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. Yes
5. AML, 46	information/context to the answers in this section. 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:	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. Yes Yes
5. AML, 46	information/context to the answers in this section. 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: Money laundering Terrorist financing Sanctions violations	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. Yes
5. AML, 46 46 a 46 b	information/context to the answers in this section. 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: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually?	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. Yes Yes
5. AML, 46 46 a 46 b 46 c	information/context to the answers in this section. 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: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at	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. Yes Yes Yes
5. AML, 46 a 46 a 46 b 46 c 47	information/context to the answers in this section. 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: 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	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. Yes Yes Yes Yes
5. AML, 46 a 46 a 46 b 46 c 47 48 a 48 a	information/context to the answers in this section. 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: 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?	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. Yes Yes Yes Yes No
5. AML, 46 a 46 a 46 b 46 c 47 48 a 48 a 48 a 48 a 48 b	information/context to the answers in this section. 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: 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	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. Yes Yes Yes Yes Yes No Yes
5. AML, 46 a 46 a 46 b 46 c 47 48 a 48 a 48 a 48 b 48 b	information/context to the answers in this section. 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: 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?	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. Yes Yes Yes Yes No
5. AML, 46 a 46 a 46 b 46 c 47 48 a 48 a 48 a 48 b 48 b 49	information/context to the answers in this section. 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: 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:	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. Yes Yes Yes Yes Yes No Yes
5. AML, 46 a 46 a 46 b 46 c 47 48 48 a 48 a1 48 b1 49 a	information/context to the answers in this section. 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: 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	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. Yes Yes Yes Yes Yes No Yes
5. AML, 46 a 46 a 46 b 46 c 47 48 48 a 48 a1 48 b 49 b	information/context to the answers in this section. 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: 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	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. Yes Yes Yes Yes Yes Yes Yes No Yes
5. AML, 46 46 a 46 b 46 c 47 48 48 a 48 a1 48 b1 49 a 49 b	information/context to the answers in this section. 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: 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	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. Yes Yes Yes Yes Yes Yes No Yes Yes Yes Yes Yes Yes
5. AML, 46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 b 49 b 49 c 49 d	information/context to the answers in this section. 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: 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	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. Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
5. AML, 46 a 46 a 46 b 46 c 47 48 48 a 48 a1 48 b 49 b 49 c 49 d 49 e	information/context to the answers in this section. 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: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity's policies and procedures updated at 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	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. Yes Yes Yes Yes Yes Yes Yes No Yes Yes Yes Yes Yes Yes
5. AML, 46 46 a 46 a 46 b 46 c 47 48 48 a 48 a1 48 b1 49 b 49 a 49 b	information/context to the answers in this section. 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: 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	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 commilment to comply with all applicable anticorruption laws. Yes Yes Yes Yes Yes Yes No Yes
5. AML, 46 a 46 a 46 b 46 c 47 48 48 a 48 a1 48 b 49 b 49 c 49 d 49 e	information/context to the answers in this section. 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: 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	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. Yes Yes Yes Yes Yes Yes No 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 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 retationship	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,	
	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. AML, C 54	information/context to the answers in this section. ITF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	are not gapped against US standards necessarily.
6. AML, G 54 54 a	information/context to the answers in this section. ITF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	are not gapped against US standards necessarily. Yes
6. AML, C 54 54 a 54 b	information/context to the answers in this section. ITF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	are not gapped against US standards necessarily. Yes Yes
6, AML, C 54 54 a 54 b 54 c	information/context to the answers in this section. ITF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	are not gapped against US standards necessarily. Yes
6. AML, G 54 54 a	information/context to the answers in this section. ITF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d	information/context to the answers in this section. ITF & 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	Yes Yes Yes
6. AML, G 54 54 a 54 b 54 c 54 d 55 55 55 a 55 b	information/context to the answers in this section. ITF & 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	Yes Yes Yes Yes Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c	information/context to the answers in this section. ITF & 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	Yes
6. AML, G 54 54 a 54 b 54 c 54 d 55 55 55 a 55 b	information/context to the answers in this section. ITF & 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	Yes Yes Yes Yes Yes Yes Yes Yes
66. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c	information/context to the answers in this section. ITF & 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	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c	information/context to the answers in this section. ITF & 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	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c	information/context to the answers in this section. ITF & 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	re not gapped against US standards necessarily. Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c	information/context to the answers in this section. ITF & 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	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	information/context to the answers in this section. ITF & 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	re not gapped against US standards necessarily. Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 f 55 f 55 f 56	information/context to the answers in this section. ITF & 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	are not gapped against US standards necessarily. Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
6. AML, G 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 f 56 a 57	information/context to the answers in this section. ITF & 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	re not gapped against US standards necessarily. Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 65 d 55 e 55 f 55 g 55 h 56 57 57 a 57 b	information/context to the answers in this section. ITF & 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	re not gapped against US standards necessarily. Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 57 a 57 a 57 b 57 c	information/context to the answers in this section. ITF & 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	are not gapped against US standards necessarily. Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57 57 a 57 c 57 d	information/context to the answers in this section. ITF & 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	re not gapped against US standards necessarily. Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 a 55 h 56 56 a	information/context to the answers in this section. ITF & 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 controls effectiveness components detailed below:	are not gapped against US standards necessarily. Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
54 a 54 a 54 b 54 c 54 b 55 c 55 a 55 a 55 c 55 d 55 c 55 d 55 c 55 d 55 a 57 a 57 a 57 a 57 d 58 58 a	information/context to the answers in this section. ITF & 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 controls effectiveness components detailed below: Customer Due Diligence	are not gapped against US standards necessarily. Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 56 a 57 57 a 57 a 57 b 57 c 57 d 58 58 a 58 b	information/context to the answers in this section. ITF & 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 controls effectiveness components detailed below: Customer Due Diligence Governance	are not gapped against US standards necessarily. Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
6. AML, G 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 56 a 57 57 a 57 a 57 d 58 58 a	information/context to the answers in this section. ITF & 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 controls effectiveness components detailed below: Customer Due Diligence	are not gapped against US standards necessarily. Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye

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

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69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74 -	If Y, is this at:	
71 a 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?	Automated
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	Control Control of the Control of th
74 a1	Less than one year	No
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes Yes
74 a4	5 years or more Trigger-based or perpetual monitoring reviews	Yes
74 a5 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	EDD on risk-based approach
76 b	Respondent Banks	EDD on risk-based approach
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	No EDD/restriction or prohibition
76 d	Extractive industries	No EDD/restriction or prohibition
76 e	Gambling customers	EDD on risk-based approach
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	No EDD/restriction or prohibition
76 h	MSB/MVTS customers	EDD on risk-based approach
761	Non-account customers	No EDD/restriction or prohibition
	Non-Government Organisations	No EDD/restriction or prohibition
76 j 76 k	Non-resident customers	No EDD/restriction or prohibition
		No EDD/restriction or prohibition
761	Nuclear power Payment Service Providers	Always subject to EDD
76 m		Always subject to EDD
76 n	PEPS Associates	EDD on risk-based approach
76 o	PEP Close Associates	EDD on risk-based approach
76 p	PEP Related	No EDD/restriction or prohibition
76 q	Precious metals and stones	No EDD/restriction or prohibition
76 r	Red light businesses/Adult entertainment	No EDD/restriction or prohibition
76 s	Regulated charities	Prohibited
76 t	Shell banks	No EDD/restriction or prohibition
76 u	Travel and Tour Companies	
76 v	Unregulated charities	No EDD/restriction or prohibition
76 w	Used Car Dealers	No EDD/restriction or prohibition
76 x 76 y	Virtual Asset Service Providers Other (specify)	Always subject to EDD MVTS/MSB customers are restricted and need authorization to be clients
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	Yes

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

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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	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	EU Regulation 847/2015
93 с	If N, explain	
94	Does the Enlity have controls to support the Inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	See annexes for branches
97	If appropriate, provide any additional information/context to the answers in this section.	
10, SANO	CTIONS	1. 153.00
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?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	No
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Both Automated and Manual
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/tool?	Both 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
	Does the Entity screen all sanctions relevant data,	
103	including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes

105	Does the Enlity 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 с	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners (i.e. reference data)
106 f	Olher (specify)	BBVA adheres to local AML Screening requirements in the jurisdictions where it has a 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?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	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.
44 TOAIN	IING & EDUCATION	
111 111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	Yes
112 f	Non-employed workers (contractors/consultants)	Yes
113	Does the Entity provide AML, CTF & Sanctions training	Yes
	that is targeted to specific roles, responsibilities and high-risk products, services and activities?	
114	that is targeted to specific roles, responsibilities and high-risk products, services and activities? Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 114 a	high-risk products, services and activities? Does the Entity provide customised training for AML,	Yes Annually

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

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129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 а	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,	
Danta	At an Obstances	
Wolfsberg Declaratio	ntion Statement Group Correspondent Banking Due Diligence Questionnaire 2023 (CE n Statement (To be signed by Global Head of Correspondent Bank ay Laundering, Chief Compliance Officer, Global Head of Financial	king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of
Wolfsberg Declaratio Anti- Mone BANCO E	Group Correspondent Banking Due Diligence Questionnaire 2023 (CE n Statement (To be signed by Global Head of Correspondent Bank by Laundering, Chief Compliance Officer, Global Head of Financial BILBAO VIZCAYA ARGENTARIA, S.A. (Financial Instituti	king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Crimes Compliance OR equivalent) ion name) is fully committed to the fight against financial crime and makes
Wolfsberg Declaratio Anti- Mone BANCO E every effo The Finan	Group Correspondent Banking Due Difigence Questionnaire 2023 (CE n Statement (To be signed by Global Head of Correspondent Bank ay Laundering, Chief Compliance Officer, Global Head of Financial BILBAO VIZCAYA ARGENTARIA, S.A. (Financial Institut rt to remain in full compliance with all applicable financial crime laws	king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Crimes Compliance OR equivalent)
Wolfsberg Declaratio Anti- Mone BANCO E every elfo The Finan legal and r	Group Correspondent Banking Due Difigence Questionnaire 2023 (CE n Statement (To be signed by Global Head of Correspondent Bankay Laundering, Chief Compliance Officer, Global Head of Financial SILBAO VIZCAYA ARGENTARIA, S.A. (Financial Institut rt to remain in full compliance with all applicable financial crime laws cial Institution understands the critical importance of having effective gulatory obligations.	king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Crimes 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.

I, SANTIAGO HERNÁNDEZ (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.

EDUARDO GARDE

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



Financial Institution Name:	
Location (Country) :	

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	
2	Append a list of foreign branches which are covered	
	by this questionnaire	
3	Full Legal (Registered) Address	
	an Logar (regionarou) / nauross	
4	Full Primary Business Address (if different from	
4	above)	
	above)	
5	Date of Entity incorporation/establishment	
6	Select type of ownership and append an ownership	
	chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	
6 b	Member Owned/Mutual	
6 c	Government or State Owned by 25% or more	
6 d	Privately Owned	
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer	
	shares	
8	Does the Entity, or any of its branches, operate under	
	an Offshore Banking License (OBL)?	
8 a	If Y, provide the name of the relevant branch/es	
o a	which operate under an OBL	
	million operate and all object	
0	Does the Bank have a Virtual Bank License or	
9	provide services only through online channels?	
40		
10	Name of primary financial regulator/supervisory authority	
	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)	
	1	l .

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

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	
19 c	Cross-Border Remittances	
19 d	Domestic Bulk Cash Delivery	
19 e	Hold Mail	
19 f	International Cash Letter	
19 g	Low Price Securities	
19 h	Payable Through Accounts	
19 i	Payment services to non-bank entities who may	
	then offer third party payment services to their customers?	
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	
19 j	Private Banking	
19 k	Remote Deposit Capture (RDC)	
19 I	Sponsoring Private ATMs	
19 m	Stored Value Instruments	
19 n	Trade Finance	
19 o	Virtual Assets	
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	
19 p4a 19 p5	If yes, state the applicable level of due diligence If you offer other services to walk-in customers	
19 þ5	please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	
3. AML, C	TF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum	
	AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	
22 b	Adverse Information Screening	
22 c	Beneficial Ownership	
22 d	Cash Reporting	
22 e	CDD	
22 f	EDD	
22 g	Independent Testing	
22 h	Periodic Review	
22 i	Policies and Procedures	
22 j	PEP Screening	
22 k	Risk Assessment	
22 I	Sanctions	

27 Taming and Excellent 28 How many full sine employees are in the Entity's MAL, CTF & Sanctions Deployees are in the Entity's AMA, CTF & Sanctions Deployees are in the Entity's AMA, CTF & Sanctions Deployees are in the Entity's AMA, CTF & Sanctions Deploy approved attested annually by the Book or equivalent Review of the CTF & Sanctions Deploy approved attested annually by the Book or equivalent Review or experience in Cuestion 29. 28 Dees the Sourd receive, seases, and challenge purposes or experience or consideration of the CTF & Sanctions programme? 29 Dees the Entity was the parties to curry out anny components of the Entity and the CTF & Sanctions programme? 20 Dees the Entity was a whistleblower policity? 20 Dees the Entity was a whistleblower policity? 21 Dees the anny have a whistleblower policity? 22 Dees the Entity was a whistleblower policity? 23 Dees the anny have a whistleblower policity? 24 Dees the Entity was a whistleblower policity? 25 Dees the Entity was a whistleblower policity? 26 Dees the Entity was a whistleblower policity? 27 Dees the anny have a whistleblower policity? 28 Dees the Entity was a whistleblower policity? 29 If appropriate, provide any additional information to the Entity that the Entity documents of policies to a fine the Entity that the Entity documents of policies and procedures consistent with a policies bed Script and the Entity that the Entity documents of policies and procedures consistent with a policies bed Script and the Entity that the Entity documents to insacrably prevent, docted and report theory and completion? 29 The the Entity that the Entity documents and procedures consistent with a policies bed Script guildent and report the Entity was an extensive and policies and procedures consistent with a policies bed Script guildent and procedures consistent with a policies bed Script guildent	22 m	Suspicious Activity Reporting	
22 a many full stime employees are in the Entity's AMU, CTF & Sanctions Compliance (Part AMU, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Monagement (Part AMU, CTF & Sanctions policy product at least annually by the Board or equivalent Senior Monagement (Part AMU, CTF & Sanctions policy product at least annually by the Board or equivalent Senior Monagement (Part AMU, CTF, & Sanctions programmer) 25 a Confirm the Board respirate special control of the AMU, CTF, & Sanctions programmer? 26 a FY, provide further details 27 Does the entity use third patries to carry out any components of the AMU, CTF, & Sanctions programmer? 28 a FY, provide further details 29 Confirm that all responses provided at the above Socious are applicated the special of the LES branches Socious are applicated the special of the LES branches Socious are applicated the special of the ABOV CONTROL (Part AMU, CTF, AMU) and the provided annual of the ABOV CONTROL (Part AMU) and the provided annual of the ABOV CONTROL (Part AMU) and the provided annual of the ABOV CONTROL (Part AMU) and the provided annual of the ABOV CONTROL (Part AMU) and the provided annual of the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part			
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27 Does the entity have a whistleblower policy? 28 Confirm that all responses provided in the above Section are representative of all the LEP tranches Section are representative of all the LEP tranches. 28 a If N, darify which questions the difference's relate to and the tranches that this applies to. 29 If appropriate, provide any additional information-context to the answers in this section. 29 If appropriate, provide any additional information-context to the answers in this section. 20 ANTI BRIBERY & CORRUPTION 30 Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and sport bibdry and corruption? 31 Does the Entity have an enterprise wide programme that sets minimum ABC standards? 32 Has the Entity appointed a designated officer or officers with sufficient representative propriative separative to the Entity have adjusted in a propriate to the Entity have adjusted and appropriate to the Entity have adjusted and appropriate to the Entity have adjusted and propriate to the Entity have adjusted and propriate to the Entity have adjusted and propriate to the Entity have adjusted ABC programme? 33 Does the Entity have adjusted ABC policy that: 35 Des the Entity have adjusted ABC policy that: 36 Prohibits the giving and receiving of brines? This includes promising, ordering, giving, solicitation or receiving of anything of value, clientify or indirectly, if improperly intended to influence addition or obtain an advertinge. 36 Des the Entity have adjusted to influence addition or obtain an advertinge. 37 Does the Entity have controls in place to monitor the effectiveness of the ABC programme? 38 If If provide the date to when the last ABC EVRA was completed. 40 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? 40 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent ri	26		
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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 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 Potential liability created by intermediaries and	33	levels of experience/expertise to implement the ABC	
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components detailed below: 40 a Potential liability created by intermediaries and		is the net result of the controls effectiveness and the inherent risk assessment?	
		components detailed below:	
	40 a		

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

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

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

69 a3	Trigger event	
69 a3 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 74 a5	5 years or more Trigger-based or perpetual monitoring reviews	
74 a5 74 a6	Other (Please specify)	
7440	Outer (Frease specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	
76 b	Respondent Banks	
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	
76 d	Extractive industries	
76 e	Gambling customers	
76 f	General Trading Companies	
76 g	Marijuana-related Entities	
76 h	MSB/MVTS customers	
76 i	Non-account customers	
76 j	Non-Government Organisations	
76 k	Non-resident customers	
76 I	Nuclear power	
76 m	Payment Service Providers	
76 n	PEPs	
76 o	PEP Close Associates	
76 p	PEP Related	
76 q	Precious metals and stones	
76 r	Red light businesses/Adult entertainment	
76 s	Regulated charities	
76 t	Shell banks	
76 u	Travel and Tour Companies	
76 v	Unregulated charities	
76 w	Used Car Dealers	
76 x 76 y	Virtual Asset Service Providers Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	

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

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
00 -	'	
93 a	FATF Recommendation 16	
93 b	Local Regulations	
93 b1	If Y, specify the regulation	
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	
95 a	If Y, does the Entity have procedures to include 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 Sanctions List (UN)	
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	
106 с	Office of Financial Sanctions Implementation HMT (OFSI)	
106 d	European Union Consolidated List (EU)	
106 e	Lists maintained by other G7 member countries	
106 f	Other (specify)	
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	
107 b	Transactions	
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	
109 а	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	
11. TRAININ	IG & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	
111 e	Conduct and Culture	
111 f	Fraud	
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	
112 b 112 c	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)	
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and	
114	high-risk products, services and activities? 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 а	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. 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)?	
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		
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	Name Screening & List Management	
123 f	Reporting/Metrics & Management Information	
123 g	Suspicious Activity Filing	
123 h	Technology	
123 i	Transaction Monitoring	
123 j	Transaction Screening including for sanctions	
123 k 123 l	Training & Education Other (specify)	
1231	Outer (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. FRAU	סנ	
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.	
<u>Declarat</u>	ion Statement	
Declaration	Froup Correspondent Banking Due Diligence Questionnaire 2023 (CE Statement (To be signed by Global Head of Correspondent Bank / Laundering, Chief Compliance Officer, Global Head of Financial	king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of
every effort		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.
	ial Institution understands the critical importance of having effective industry obligations.	ve and sustainable controls to combat financial crime in order to protect its reputation and to meet its
The Financ standards.	ial Institution recognises the importance of transparency regardin	ng parties to transactions in international payments and has adopted/is committed to adopting these
	ial Institution further certifies it complies with / is working to compl ation provided in this Wolfsberg CBDDQ will be kept current and v	ly with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. will be updated no less frequently than every eighteen months.
The Financ	ial 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 provided the property of the Financial
I, Wolfsberg (ivalent), certify that I have read and understood this declaration, that the answers provided in this am authorised to execute this declaration on behalf of the Financial Institution.
	(Signature & Dat	(e)
	(Signature & Dat	e)
i	e e	

the Wolfsberg Group

Financial Institution Name: Location (Country) :

BBVA Bank	
Taiwan	

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

No#	Ougetier	T
	Question	Answer
	& OWNERSHIP	
1	Full Legal Name	
		BBVA Bank
2	Append a list of foreign branches which are covered by	
	this questionnaire	Taised Bassak
		Taipei Branch
3	Full Legal (Registered) Address	
Ū	Tan Logar (Noglotorod) / tadroos	
		Unit D, Level 45, Taipei 101 tower, No.7 Xinyi Rd. Sec 5, Taipei City 11049, Taiwan, ROC
		Simple and the following the f
4	Full Primary Business Address (if different from above)	
	,	1
5	Date of Entity incorporation/establishment	
		A Marian La
		11/23/2011
6	Select type of ownership and append an ownership chart	
3	if available	
	l	
6 a	Publicly Traded (25% of shares publicly traded)	
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	
e h	Momber Owned/Mutual	
6 b	Member Owned/Mutual	
6 c	Government or State Owned by 25% or more	
6 d	Privately Owned	
6 d1	If Y, provide details of shareholders or ultimate	·
	beneficial owners with a holding of 10% or more	
		•
7	% of the Entity's total shares composed of bearer shares	
•	The art are arranged composed of Boards division	
8	Does the Entity, or any of its branches, operate under an	
	Offshore Banking License (OBL)?	
8 a	If Y, provide the name of the relevant branch/es which	
	operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide	
,	services only through online channels?	
10	Name of primary financial regulator/supervisory authority	
10	radino or primary intended regulator/supervisory autitionty	
		Financial Supervisory Committee (FSC)
11	Provide Legal Entity Identifier (LEI) if available	
		I
40	Davids the Citizent and Citizent Citizent	
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	
i		•
	İ	1
13	Jurisdiction of licensing authority and regulator of ultimate	
	parent	
	Pulois	
	in the second se	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	No
14 b		No

14 c		
	Commercial Banking	No
14 d	Transactional Banking	No
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
	Wealth Management	
<u>14 j</u>		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)	No
15 a	If Y, provide the top five countries where the non- resident customers are located.	
40	C-1	
16	Select the closest value:	A Company of the Comp
16 a	Number of employees	1-50
16 b	Total Assets	Between \$10 and \$100 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	
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.	
	to the answers in this section.	
2. PRODI	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services:	No.
2. PRODI 19	UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking	No
2. PRODI	UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking	No And
2. PRODU 19 19 a 19 a1	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to	No
2. PRODI 19 19 a 19 a 19 a1 19 a1a	to the answers in this section. DOES & SERVICES Does the Entity offer the following products and 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	No No
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b	to the answers in this section. JCTS & SERVICES Does the Entity offer the following products and 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 .
2. PRODI 19 19 a 19 a 19 a1 19 a1a 19 a1b	to the answers in this section. DOES & SERVICES Does the Entity offer the following products and 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
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b 19 a1c	to the answers in this section. DOES & SERVICES Does the Entity offer the following products and 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
2. PRODI 19 19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d	Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity offer Correspondent Banking lif 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 foreign banks? Does the Entity foreign banks?	
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f	Does the Entity offer Correspondent Banking services to domestic banks? 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 fore 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	No
2. PRODI 19 19 a 19 a 19 a 19 a 19 a 10 a 10 a 10 a 10 a 10 a 10 a 10 a 10	DOES the Entity offer the following products and 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	No No
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f	Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships with foreign 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 forer 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

19 a1i 19 b 19 c 19 d	Does the Entity have processes and procedures in	
19 b 19 c 19 d		
19 c 19 d	place to identify downstream relationships with	No
19 c 19 d		
19 c 19 d	MSBs /MVTSs/PSPs?	
19 d	Cross-Border Bulk Cash Delivery	No
	Cross-Border Remittances	Yes
40	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	
	offer third party payment services to their customers?	No
	oner time party payment services to their easterners	No
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	No
19 i3	Virtual Asset Service Providers (VASPs)	
		No
19 i4	eCommerce Platforms	No
19 i5	Other - Please explain	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
19 p	For each of the following please state whether you	
12 b		
	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	
19 p2	Wire transfers	Yes
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	
19 p5	If you offer other services to walk-in customers	
10 00	please provide more detail here, including	
1	describing the level of due diligence.	
10.0	Other high risk products and services identified by the	
19 q	Other high-risk products and services identified by the	
19 q	Other high-risk products and services identified by the Entity (please specify)	
19 q		
19 q		
	Entity (please specify)	
20	Entity (please specify) Confirm that all responses provided in the above Section	
20	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches.	
20	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches.	
20	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	
20	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches.	
20	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	
20	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	
20 20 a	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.	
20 20 a	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	
20 20 a	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.	
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22 m	Suspicious Activity Reporting	
22 n	Training and Education	
22 o 23	Transaction Monitoring How many full time employees are in the Entity's AML,	
23	CTF & Sanctions Compliance Department?	11-100
24	Is the Entity's AML, CTF & Sanctions policy approved at	
24	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	No
	components of its AML, CTF & Sanctions programme?	INC.
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.	
		Taipel branch does not deal with cash
A ANTIF	L BRIBERY & CORRUPTION	<u>l</u>
14. ANTI E	Has the Entity documented policies and procedures	
30	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	N.
-	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?	
33	Does the Entity have adequate staff with appropriate	
	levels of experience/expertise to implement the ABC	
34	programme? Is the Entity's ABC programme applicable to:	Net Applicable
35	Does the Entity have a global ABC policy that:	Not Applicable
35 a	Prohibits the giving and receiving of bribes? This	The state of the s
35 a	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	No
40	inherent risk assessment?	
40	Does the Entity's ABC EWRA cover the inherent risk	
40 a	components detailed below:	
40 d	Potential liability created by intermediaries and other third-party providers as appropriate	
40 b	Corruption risks associated with the countries and	
700	industries in which the Entity does business, directly or	Yes
	through intermediaries	
40 c	Transactions, products or services, including those	77.5%
	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	I.

40 e	Changes in business activities that may materially	
41	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	No
42 b	1st Line of Defence	INO
	2nd Line of Defence	The second secon
42 c 42 d	3rd Line of Defence	No
		NO .
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	No
42 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable
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	
45	to the answers in this section.	
5. AML. (_ CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
	consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent,	
	detect and report:	。
46 a	Money laundering	
46 b	Terrorist financing	
46 c	Sanctions violations	
47	Are the Entity's policies and procedures updated at least annually?	
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	
48 b1	If Y, does the Entity retain a record of the results?	
49 DT	Does the Entity have policies and procedures that:	
49 49 a	Prohibit the opening and keeping of anonymous and	
43 d	fictitious named accounts	
49 b	Prohibit the opening and keeping of accounts for	
	unlicensed banks and/or NBFIs	
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	
49 d	Prohibit accounts/relationships with shell banks	
49 e	Prohibit dealing with another entity that provides services to shell banks	
49 f	Prohibit opening and keeping of accounts for Section	
40 =	311 designated entities	
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges	
	houses, casa de cambio, bureaux de change or	
	nouses, casa de cambio, bureaux de change or money transfer agents	
49 h	Money transfer agents Assess the risks of relationships with domestic and	
47 11	foreign PEPs, including their family and close	
	associates	

49 i	Define the process for escalating financial crime risk	
	issues/potentially suspicious activity identified by	
-	employees	
49 j	Define the process, where appropriate, for terminating	1
	existing customer relationships due to financial crime	
	risk	
49 k	Define the process for exiting clients for financial	
43 K		
	crime reasons that applies across the entity, including	
	foreign branches and affiliates	
49 1	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	
40		
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	
4511		
	"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?	į
51 a	If Y, what is the retention period?	
J. u	, macio dio rotondon penoa:	
		<u> </u>
En	Confirm that all soonanees south distinction 2	
52	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	
52 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
	11	
53	If appropriate, provide any additional information/context	
	to the answers in this section.	
	to the districts in the booker.	
e AMI CT	F & SANCTIONS RISK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the inherent	
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 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	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	
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;	
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: Transaction Monitoring	
54 a 54 b 54 c 54 d 55 a 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 Customer Due Diligence	
54 a 54 b 54 c 54 d 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 a 54 b 54 c 54 d 55 c 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 Transaction Screening	
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54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e	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	
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e	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 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g	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 a 54 a 54 b 54 c 54 d 55 65 a 65 b 55 c 55 d 55 c 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	
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g	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	
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 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 a 54 a 54 b 54 c 54 d 55 65 a 65 b 55 c 55 d 55 c 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 in	
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54 a 54 a 54 b 54 c 54 d 55 65 a 65 b 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Client Croduct 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 a 54 a 54 b 54 c 54 d 55 55 a 655 b 55 c 555 d 555 c 555 d 556 a 557 a 57 a 57 a 57 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	
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54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57 c 57 a 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	
54 a 54 a 54 b 54 c 54 d 55 c 55 a 65 b 55 c 55 d 55 c 55 f 55 g 55 f 56 a 57 a 57 a 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 Channel Geography Does the Entity's Sanctions EWRA cover the controls	
54 a 54 a 54 b 54 c 54 d 55 c 55 a 655 b 55 c 555 d 555 c 556 d 557 a 57 a 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 a 54 a 54 b 54 c 54 d 55 c 55 a 65 b 55 c 55 d 55 c 55 f 55 g 55 a 56 a 57 a 57 a 57 c 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 Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a 57 a 57 a 57 a 57 a 58 a 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: Customer Due Diligence Governance	
54 a 54 a 54 b 54 c 54 d 55 c 55 a 65 b 55 c 55 d 55 c 55 f 55 g 55 a 56 a 57 a 57 a 57 c 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: Customer Due Diligence Governance List Management	
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a 57 a 57 a 57 a 57 a 58 a 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: Customer Due Diligence Governance	
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 c 55 d 55 c 55 f 56 a 57 a 57 a 57 a 57 b 57 c 57 d 58 a 58 a 58 b 58 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 Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance List Management	

58 e	Name Screening	
58 f	Transaction Screening	
58 g	Training and Education	
59	Has the Entity's Sanctions EWRA been completed in the	
	last 12 months?	
59 a	If N, provide the date when the last Sanctions EWRA	
	was completed.	
60	Confirm that all responses provided in the above Section	
00	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.	
	and the present of the second	
61	If appropriate, provide any additional information/context	
	to the answers in this section.	
	·	
7. KYC C	DD and EDD	
62	Does the Entity verify the identity of the customer?	
63	Do the Entity's policies and procedures set out when	,
	CDD must be completed, e.g. at the time of onboarding	
	or within 30 days?	
64	Which of the following does the Entity gather and retain	
	when conducting CDD? Select all that apply:	
64 a	Customer identification	
64 b	Expected activity	
64 c	Nature of business/employment	
64 d	Ownership structure	
64 e	Product usage	
64 f	Purpose and nature of relationship	
64 g	Source of funds	
64 h	Source of wealth	
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	
65 a1	Are ultimate beneficial owners verified?	
65 b	Authorised signatories (where applicable)	
65 c	Key controllers	
65 d	Other relevant parties	
66	What is the Entity's minimum (lowest) threshold applied to	
	beneficial ownership identification?	
67	Does the due diligence process result in customers	
	receiving a risk classification?	
67 a	If Y, what factors/criteria are used to determine the	
-	customer's risk classification? Select all that apply:	
67 a1	Product Usage	
67 a2	Geography	
67 a3	Business Type/Industry	
67 a4	Legal Entity type	
67 a5	Adverse Information	
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part	
	of your KYC process?	
68 a	If Y, is this at:	
68 a1	Onboarding	
68 a2	KYC renewal	
68 a3	Trigger event	
68 a4	Other	, 1/2 (/2 (/2 (/2 (/2 (/2 (/2 (/2 (/2 (/2 (
68 a4a	If yes, please specify "Other"	
), [
	Described Figure 1	
69	Does the Entity have a risk based approach to screening	
	customers for Adverse Media/Negative News?	
<u> </u>	If V is this at	
69 a	If Y, is this at:	
69 a1	Onboarding KYC renewal	
69 a2	[(VIOTellewdi	

69 a3	Trigger event	
70	What is the method used by the Entity to screen for	
	Adverse Media/Negative News?	
71	Does the Entity have a risk based approach to screening	
• •	customers and connected parties to determine whether	
	they are PEPs, or controlled by PEPs?	
	and y are ? E? e, o, demanded by ? E? e,	
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)	
1740	Outor (1 lodge speedily)	
		<u> </u>
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?	
70 -		D. 49.4
76 a	Arms, defence, military	Prohibited
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	EDD on risk-based approach
76 d	Extractive industries	
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	
76 g	Marijuana-related Entities	
76 h	MSB/MVTS customers	
76 I	Non-account customers	Prohibited
76 j	Non-Government Organisations	Prohibited
76 k	Non-resident customers	Prohibited
	Nuclear power	Попился
76 l		EDD on risk based approach
76 m	Payment Service Providers	EDD on risk-based approach
76 n	PEPs PEP Class Associates	
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	Prohibited
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)	
,	1 "	Į
		ļ
77	If restricted, provide details of the restriction	
		ļ
78	Does EDD require senior business management and/or	į
	compliance approval?	

78 a	If Y indicate who provides the approval:	
79	Does the Entity have specific procedures for onboarding	
	entities that handle client money such as lawyers,	
	accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or quality	
	review on clients subject to EDD?	
81	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	
81 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
82	If appropriate, provide any additional information/context	
	to the answers in this section.	
0.1401117		
	TORING & REPORTING	
83	Does the Entity have risk based policies, procedures and	
	monitoring processes for the identification and reporting	
	of suspicious activity?	
84	What is the method used by the Entity to monitor	Combination of automated and manual
84 a	transactions for suspicious activities? If manual or combination selected, specify what type	
04 a	of transactions are monitored manually	
	of transactions are monitored mandally	
84 b	If automated or combination selected, are internal	
	system or vendor-sourced tools used?	
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is	
	the name of the vendor/tool?	
84 b2	When was the tool last updated?	
84 b3	When was the automated Transaction Monitoring	
0.7.00	application last calibrated?	
85	Does the Entity have regulatory requirements to report	
	suspicious transactions?	
85 a	If Y, does the Entity have policies, procedures and	
	processes to comply with suspicious transaction	
	reporting requirements?	
86	Does the Entity have policies, procedures and processes	
	to review and escalate matters ansing 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	
90	timely manner? Confirm that all responses provided in the above Section	
90	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	
	and and an arranged and an applied to	
91	If appropriate, provide any additional information/context	
	to the answers in this section.	
9. PAYME	ENT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment	
	Transparency Standards?	

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure	
	compliance with:	
93 a	FATF Recommendation 16	
93 b 93 b1	Local Regulations If Y, specify the regulation	
93 01	ii i, specify the regulation	
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	
96	Confirm that all responses provided in the above Section	
96 a	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.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANCT	CONS	
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'	
102 a1	selected: 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	
103	Does the Entily screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	
104	What is the method used by the Entity?	
105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	

106 d 106 e 106 f	European Union Consolidated List (EU) Lists maintained by other G7 member countries Other (specify)	
106 f	Other (page) (A)	
	(Specify)	
	`` "	
107	When regulatory authorities make updates to their	
	Sanctions list, how many business days before the entity	
	updates their active manual and/or automated screening	
	systems against:	
107 a	Customer Data	
107 b	Transactions	
108	Does the Entity have a physical presence, e.g. branches,	
100	subsidiaries, or representative offices located in	
	countries/regions against which UN, OFAC, OFSI, EU or	
	G7 member countries have enacted comprehensive	
	jurisdiction-based Sanctions?	
109	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	
109 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
	approx con	
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	Identification and reporting of transactions to	
	government authorities	
111 b	Examples of different forms of money laundering,	
	terrorist financing and sanctions violations relevant for	
	the types of products and services offered	
111 c	Internal policies for controlling money laundering,	
1116	terrorist financing and sanctions violations	
111 d		
iiia	New issues that occur in the market, e.g. significant	
111.0	regulatory actions or new regulations	
111 e	Conduct and Culture	
111 f	Fraud	
112	Is the above mandatory training provided to :	
112 a	Board and Senior Committee Management	
112 b	1st Line of Defence	
112 c	2nd Line of Defence	
112 d	3rd Line of Defence	
112 e	Third parties to which specific FCC activities have	
	been outsourced	
112 f	Non-employed workers (contractors/consultants)	
113	Does the Entity provide AML, CTF & Sanctions training	
	that is targeted to specific roles, responsibilities and high	
	risk products, services and activities?	
		i i i i i i i i i i i i i i i i i i i
114	Does the Entity provide customised training for AML, CTF	
	and Sanctions staff?	
114 a	If Y, how frequently is training delivered?	
	,,	
	Confirm that all responses provided in the above Section	
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
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)?	
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		
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	
122	basis? 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	- Walter - W
123	Does the internal audit function or other independent third	
123 a	party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures	
123 b	Enterprise Wide Risk Assessment	
123 c	Governance	
123 d	KYC/CDD/EDD and underlying methodologies	
123 e	Name Screening & List Management	
123 f 123 g	Reporting/Metrics & Management Information Suspicious Activity Filing	
123 h	Technology	
123 i	Transaction Monitoring	
123 j	Transaction Screening including for sanctions	
123 k	Training & Education	
123	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 а	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	D.	
127	Does the Entity have policies in place addressing fraud	
400	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.			
<u>Declaratio</u>	on Statement			
Declaration St	oup Correspondent Banking Due Diligence Questionnaire 2023 (tatement (To be signed by Global Head of Correspondent Bankin Chief Compliance Officer, Global Head of Financial Crimes Compl	ng of equivalent position holder AND Group Money Laundering Prevention Officer, Clobal Head of Anti, Money		
BBVA Bank, T	• • • • • • • • • • • • • • • • • • • •			
every effort to	(Financial Institution) remain in full compliance with all applicable financial crime laws,	on 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.		
The Financial obligations.	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		
The Financial	Institution recognises the importance of transparency regarding p	parties to transactions in international payments and has adopted/is committed to adopting these standards.		
The Financial provided in thi	Institution further certifies it complies with / is working to comply wis Wolfsberg CBDDQ will be kept current and will be updated no lo	with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information ess frequently than every eighteen months.		
The Financial	institution commits to file accurate supplemental information on a	timely basis.		
(Global Head of Correspondent Banking or equivalent), certify that I have read and understood 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.				
[A]				
	(Signature & Date) Date: 2025.4.18		

the Wolfsberg Group

Financial institution Name: Location (Country) : Banco Bilbao Vizcaya Argentaria S.A. 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 dotails 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
CONTRACTOR CONTRACTOR	TY & OWNERSHIP	Aliswei
1. EN 111		T
1	Full Legal Name	
	A	
2	Append a list of foreign branches which are covered	Hong Kong
	by this questionnaire	
ļ		
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.
		Changed to Banco Bibao Vizcaya Argentana, 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	Disease solvei
	provide services only through online channels?	Please select
10	Name of primary financial regulator/supervisory	Hong Kong Monetary Authority
	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)	
	<u> </u>	1

Jurisdiction of licensing authority and regulator of ultimate parent 14	
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 f Financial Markets Trading Please select 14 h Broker/Dealer Please select 14 i Multilateral Development Bank Please select 14 i Multilateral Development Bank Please select 14 j Wealth Management No 15 Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided) 15 a If Y, provide the top five countries where the non-resident customers are located. Australia, Taiwan, U.S.A., Netherlands, United Kingdom	
14 a Retail Banking	
14 b	
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 Please select 14 h Broker/Dealer Please select 14 i Multilateral Development Bank Please select 14 i Multilateral Development Bank Please select 14 j Wealth Management No 14 k Other (please explain) 15 Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided) 15 a If Y, provide the top five countries where the non-resident customers are located. Australia, Taiwan, U.S.A., Netherlands, United Kingdom	
14 d Transactional Banking Please select 14 e Investment Banking Please select 14 f Financial Markets Trading Please select 14 g Securities Services/Custody Please select 14 h Broker/Dealer Please select 14 i Multilateral Development Bank Please select 14 j Wealth Management No 14 k Other (please explain) 15 Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided) 15 a If Y, provide the top five countries where the non-resident customers are located. Australia, Taiwan, U.S.A., Netherlands, United Kingdom	
14 e	
14 f	
14 g	
14 h Broker/Dealer Please select 14 i Multilateral Development Bank Please select 14 j Wealth Management No 14 k Other (please explain) 15 Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided) 15 a If Y, provide the top five countries where the non-resident customers are located. Australia, Taiwan, U.S.A., Netherlands, United Kingdom	
14 I Multilateral Development Bank Please select 14 J Wealth Management No 14 k Other (please explain) 15 Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided) 15 a If Y, provide the top five countries where the non-resident customers are located. Australia, Taiwan, U.S.A., Netherlands, United Kingdom Select the closest value:	
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) 15 a If Y, provide the top five countries where the non-resident customers are located. Australia, Taiwan, U.S.A., Netherlands, United Kingdom Select the closest value:	
14 k Other (please explain) 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) If y, provide the top five countries where the non-resident customers are located. Australia, Taiwan, U.S.A., Netherlands, United Kingdom Select the closest value:	
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customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided) 15 a If Y, provide the top five countries where the non-resident customers are located. Australia, Taiwan, U.S.A., Netherlands, United Kingdom Select the closest value:	
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15 a If Y, provide the top five countries where the non-resident customers are located. Australia, Taiwan, U.S.A., Netherlands, United Kingdom Select the closest value:	
resident customers are located. Australia, Taiwan, U.S.A., Netherlands, United Kingdom Select the closest value:	
resident customers are located. Australia, Taiwan, U.S.A., Netherlands, United Kingdom Select the closest value:	
16 Select the closest value:	
16 a Number of employees 51-200	
16 b Total Assets Please select	Line
17 Confirm that all responses provided in the above	
Section are representative of all the LE's branches.	
·	
and the branch/es that this applies to.	
18 If appropriate, provide any additional	
information/context to the answers in this section.	
2. PRODUCTS & SERVICES	
services:	
19 a Correspondent Banking Please select	
19 a1 If Y	2.0
19 a1a Does the Entity offer Correspondent Banking	- Indiana
services to domestic banks?	.
19 a1b Does the Entity allow domestic bank clients to	
provide downstream relationships?	•
19 a1c Does the Entity have processes and procedures	
In place to identity downstream relationships with domestic banks?	-
19 a1d Does the Entity offer Correspondent Banking	
Solvices to lotely in Daliks (
19 a1e Does the Entity allow downstream relationships with foreign banks?	
With total grid ballicar	
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	
19 a1g Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	
services to regulated Money Services Businesses No	
services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	
services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? 19 a1h Does the Entity allow downstream relationships	
services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? 19 a1h Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	
services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? 19 a1h Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? 19 a1h Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? 19 a1h1 MSBs Please select	
services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? 19 a1h Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	

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	Please select
19 c	Cross-Border Remittances	Please select
19 d	Domestic Bulk Cash Delivery	Please select
19 e	Hold Mail	No San
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 San
19 l1	If Y, please select all that apply below?	
19 12	Third Party Payment Service Providers	No
19 i3	Virtual Asset Service Providers (VASPs)	No
19 14	eCommerce Platforms	No Inc.
19 15	Other - Please explain	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	Please select
19 l	Sponsoring Private ATMs	Please select
19 m	Stored Value Instruments	No
19 n	Trade Finance	Please select
19 o	Virtual Assets	No management
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 See See See See See See See See See Se
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p3	Foreign currency conversion	No Exercise
19 p3a	If yes, state the applicable level of due diligence	Please select
19 p4	Sale of Monetary Instruments	No Lead
19 p4a	If yes, state the applicable level of due diligence If you offer other services to walk-in customers	Please select
19 p5	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 а	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.
3. AML C	TF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	Please select
22 b	Adverse Information Screening	Please select
22 c	Beneficial Ownership	Please select
22 d	Cash Reporting	Please select
22 е	CDD	Please select
22 f	EDD	I missis a section to
		Please select
22 g	Independent Testing	Please select
22 g 22 h	Independent Testing Periodic Review	Please select Please select
22 g 22 h 22 i	Independent Testing Periodic Review Policies and Procedures	Please select Please select Please select
22 g 22 h 22 i 22 j	Independent Testing Periodic Review Policies and Procedures PEP Screening	Please select Please select Please select Please select
22 g 22 h 22 i	Independent Testing Periodic Review Policies and Procedures	Please select Please select Please select

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 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	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 е	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	Fiedse Select
	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 AMI C	TF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	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
	banking services to unlicensed banks	
49 c 49 d 49 e		Please select Please select
49 d	banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides	Please select
49 d 49 e	banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for	Please select Please select

140:	Define the process for any deline for a let along the	
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,	
6. AML. 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 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 с	PEP Identification	Please select
55 d	Transaction Screening	Please select
55 e	Name Screening against Adverse Media/Negative News	Please select
55 f 55 g	Training and Education 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 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 58	Geography Does the Entity's Sanctions EWRA cover the controls	Please select
	effectiveness components detailed below:	
58 a 58 b	Customer Due Diligence Governance	Please select
58 c	List Management	Please select
58 d	1 - or management	Please select
	Management Information	

(=0	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 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 select
64 e	Product usage	Please select
64 f	Purpose and nature of relationship	
	Source of funds	Please select
64 g		Please select
64 h	Source of wealth	Please select
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Please select
65 a1	Are ultimate beneficial owners verified?	Please select
65 b	Authorised signatories (where applicable)	Please select
65 c	Key controllers	Please select
65 d	Other relevant parties	Please select
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	Please select
67	Does the due diligence process result in customers receiving a risk classification?	Please select
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Please select
67 a2	Geography	Please select
67 a3	Business Type/Industry	Please select
67 a4	Legal Entity type	Please select
67 a5	Adverse Information	Please select
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Please select
68 a	If Y, is this at:	
68 a1	Onboarding	Please select
68 a2	KYC renewal	Please select
68 a3	Trigger event	Please select
68 a4	Other	Please select
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Please select
69 a	If Y, is this at:	
69 a1	Onboarding	Please select
69 a2	KYC renewal	Please select

60.02	Trigger ought	
69 a3	Trigger event	Please select
	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) Does the Entity maintain and report metrics on current	
	and past periodic or trigger event due diligence reviews?	Please select
76	From the list below, which categories of customers or Industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Please select
76 b	Respondent Banks	Please select
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Please select
76 c	Embassies/Consulates	Please select
76 d	Extractive industries	Please select
76 e	Gambling customers	Please select
76 f	General Trading Companies	Please select
76 g	Marijuana-related Entities	Please select
76 h	MSB/MVTS customers	Please select
76 i	Non-account customers	Please select
76 J	Non-Government Organisations	Please select
76 k	Non-resident customers	Please select
761	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 г	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	Do not have this category of customer or industry
76 y	Other (specify)	DO NACHOTO RIIS CAREGOLY OI CUSCOINEI OI INCUSSIY
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	Please select

78 a	If V indicate who provides the approval.	I.B.
	If Y indicate who provides the approval: Does the Entity have specific procedures for	Please select
	onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Please select
	Does the Entity perform an additional control or quality review on clients subject to EDD?	Please select
	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	
	If appropriate, provide any additional information/context to the answers in this section.	
8. MONITO	RING & REPORTING	
[:	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Please select
	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
	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
1	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Please select
ļr	Does the Entity have a data quality management programme to ensure that complete data for all ransactions are subject to monitoring?	Please select
	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entitles in a timely manner?	Please select
Į.	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Please select
	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	
	f appropriate, provide any additional nformation/context to the answers in this section.	
PAYMENT	T TRANSPARENCY	
	Does the Entity adhere to the Wolfsberg Group	Olean solesi
F	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	FATE Recommendation 16	Please select
93 b		Please select
	Local Regulations	Please select
93 b1	If Y, specify the regulation	Anti-Money Laundering and Counter-Terrorist Financing Ordinance, Cap. 615
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	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. SAN	CTIONS	
98	Does the Entity have a Sanctions Policy approved by	
	management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Please select
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Please select
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Please select
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Please select
102	What is the method used by the Entity for sanctions screening?	Please select
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Please select
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	Please select
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Please select
104	What is the method used by the Entity?	Please select

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Please select
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Please select
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Please select
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Please select
106 d	European Union Consolidated List (EU)	Please select
106 e	Lists maintained by other G7 member countries	Please select
106 f	Other (specify)	
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Please select
107 b	Transactions	Please select
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	Please select
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	
11. TRAINI	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	2nd Line of Defence	Please select
112 d	3rd Line of Defence	Please select
112 e	Third parties to which specific FCC activities have been outsourced	Please select
112 f	Non-employed workers (contractors/consultants)	Please select
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Please select
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Please select
114 a	If Y, how frequently is training delivered?	Please select
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
12. QUALIT	Y 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 parly, 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
123 123 a	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and	
123 a	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
123 g	Suspicious Activity Filing	Please select 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 I	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 а	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. FRAUC 127	Does the Entity have policies in place addressing	Plane solet
120	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.	
Wolfsberg (tion Statement Group Correspondent Banking Due Diligence Questionnaire 2023 (CE n Statement (To be slaned by Global Head of Correspondent Bank	BDDQ V1.4) ing or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head o

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

Banco Bilbao Vizcaya Argentaria, S.A. (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts. The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

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

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

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

(Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration on behalf of the Financial Institution.

(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.

(Signature & Date)

(Signature & Date)

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

the Wolfsberg Group

Financial Institution Name: BANCO BILBAO VIZCAYA ARGENTARIA SA - PORTUGAL BRANCH PORTUGAL

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
. ENTITY	& OWNERSHIP	
	Full Legal Name	BANCO BILBAO VIZCAYA ARGENTARIA SA - PORTUGAL BRANCH
2	Append a list of foreign branches which are covered by this questionnaire	PORTUGAL
3	Full Legal (Registered) Address	AV. LIBERDADE 222 1250-148 LISBON PORTUGAL
4	Full Primary Business Address (if different from above)	AV. LIBERDADE 222 1250-148 LISBON PORTUGAL
5	Date of Entity incorporation/establishment	29-06-2018
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/Mulual	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	
В	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	
	Select the business areas applicable to the Entity	
14		Planto valed
14 a	Retail Banking	Please select
14 b	Private Banking	Please select
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	Please select
14 h	Broker/Dealer	Please select
141	Multilateral Development Bank	Please select
	The state of the s	Please select
14 j	Wealth Management	Please select
14 k	Other (please explain)	
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	Please select
15 a	If Y, provide the top five countries where the non- resident customers are located.	
46	Select the elegact value:	
16	Select the closest value:	201-500
16 a	Number of employees	
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.	1 1000 001001
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:	- Company
19 a	Correspondent Banking	Please select
19 a1	IfY	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	No
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	No
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Please select
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Yes
	Does the Entity allow downstream relationships	No
19 a1e	with foreign banks?	
19 a1e	with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Yes
	Does the Entity have processes and procedures in place to identify downstream relationships with	Yes No
19 a1f	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	
19 a1f 19 a1g 19 a1h	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
19 a1f	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	

19 a1l	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 select
19 e	Hold Mail	Please select
19 f	International Cash Letter	Please select
	Low Price Securities	Please select
19 g		
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?	Please select
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)	No
19 14	eCommerce Platforms	Please select
19 15	Other - Please explain	
19 j	Private Banking	Please select
19 k	Remote Deposit Capture (RDC)	Please select
191	Sponsoring Private ATMs	Please select
19 m	Stored Value Instruments	Please select
19 n	Trade Finance	Please select
19 n	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	Please select
19 p1a	If yes, state the applicable level of due diligence	Please select
		No No
19 p2	Wire transfers	M45
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	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.	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.	
3. AML, C	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
	CDD	Please select
22 e	1.86(3)	
	EDD	Please select
	I Independent Testing	Please select
22 g	Independent Testing	
22 g	Periodic Review	Please select
22 g 22 h	A CONTRACT OF THE CONTRACT OF	Please select Please select
22 g 22 h 22 i	Periodic Review	300 Maria - 1200 C
22 f 22 g 22 h 22 i 22 j 22 k	Periodic Review Policies and Procedures	Please select

22 m	Suspicious Activity Reporting	Please select
22 n	Training and Education	Please select
22 o	Transaction Monitoring	Please select
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	1-10
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Please select
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Please select
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Please select
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Please select
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	
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?	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 improperty 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

	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,	CTF & 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:	Please select
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 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:	Please select
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 Terrorist financing	Please select Please select
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 Are the Entity's policies and procedures updated at	Please select Please select Please select
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? Has the Entity chosen to compare its policies and procedures against: U.S. Standards	Please select Please select Please select
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? Has the Entity chosen to compare its policies and procedures against:	Please select Please select Please select Please select
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: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards	Please select
46 a 46 b 46 c 47 48 a 48 a 48 a 1	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?	Please select
46 a 46 a 46 b 46 c 47 48 48 a 48 a1 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? Does the Entity have policies and procedures that:	Please select
46 a 46 b 46 c 47 48 a 48 a 1 48 b 48 b 1	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	Please select
46 a 46 b 46 c 47 48 a 48 a 1 48 b 48 b 1 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 and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Please select
46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 b 48 b 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 Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Please select
46 a 46 a 46 b 46 c 47 48 48 a 48 a1 48 b1 49 a 49 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? 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	Please select
46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 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 Prohibit dealing with another entity that provides services to shell banks	Please select
46 a 46 a 46 b 46 c 47 48 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 dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities	Please select
46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 b 49 b 49 c 49 c 49 d 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 Prohibit opening and keeping of accounts for	Please select

491	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by	Please select
	employees	Lings a point
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.	
6. AML, C	TF & SANCTIONS RISK ASSESSMENT	
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	Piease select
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
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
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
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:	Please select Please select
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 Does the Entity's AML & CTF EWRA cover the	Piease select Piease select Piease select
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: Transaction Monitoring	Please select Please select Please select Please select
54 a 54 b 54 c 54 d 55 55 55 a 55 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 controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Please select Please select Please select Please select Please select
54 a 54 b 54 c 54 d 55 55 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 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 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	Please select
54 a 54 b 54 c 54 d 55 5 a 55 b 55 c 55 d 55 e	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
54 a 54 b 54 c 54 d 55 5 5 a 55 b 55 c 55 d 55 f	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	Please select
54 a 54 b 55 c 55 a 55 c 55 d 55 c 55 f 55 g	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?	Piease select
54 a 54 b 54 c 55 d 55 c 55 d 55 c 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 Governance Management Information Has the Entity's AML & CTF EWRA been completed	Please select
54 a 54 a 54 b 54 c 54 c 55 d 55 a 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 d 55 d 55 d 55 d 55 d 55 d 55 d 56 d 57 d 58 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	Please select
54 a 54 a 54 b 55 c 55 a 55 b 55 c 55 c 55 d 55 c 55 d 55 c 55 d 55 6 55 6 55 6 55 6	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.	Please select
54 a 54 b 55 c 55 a 55 b 55 c 55 d 55 f 55 g 55 h 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 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.	Please select
54 a 54 a 54 b 54 c 54 c 55 d 55 a 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 d 55 d 56 a 57 a 57 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: 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 a 54 a 54 b 54 c 54 c 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 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 Product Channel Geography	Please select
54 a 54 b 55 d c 55 d c 55 b 55 c 55 d 55 b 55 c 55 d 55 f 55 g 55 h 56 a 57 57 a 57 b 57 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: Client Product Channel	Please select
54 a 54 a 54 b 554 c 554 d 555 b 555 a 555 b 555 c 555 d 556 a 557 b 56 a 57 a 57 a 57 b 57 c 57 d 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 Does the Entity's Sanctions EWRA cover the controls	Please select
54 a 54 b 54 c 55 c 55 d 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 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	Please select
54 a 54 a 54 b 55 d c 55 d c 55 d c 55 a 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 57 a 57 a 57 b 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 controls effectiveness components detailed below: Customer Due Diligence	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 KVC	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	Other relevant parties	Please select
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	Please select
67	Does the due diligence process result in customers receiving a risk classification?	Please select
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Please select
67 a2	Geography	Please select
67 a3	Business Type/Industry	Please select
67 a4	Legal Entity type	Please select
67 a5	Adverse Information	Please select
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Please select
68 a	If Y, is this at:	
68 a1	Onboarding	Please select
68 a2	KYC renewal	Please select
68 a3	Trigger event	Please select
68 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
-	General Trading Companies	Please select
76 f		EDD on risk-based approach
76 g	Marijuana-related Entities	
76 h	MSB/MVTS customers	Always subject to EDD
76 i	Non-account customers	Prohibited
76]	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	EDD on risk-based approach
761	Nuclear power	EDD on risk-based approach
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	EDD on risk-based approach
76 q		Please select
76 r	Red light businesses/Adult entertainment	
76 s	Regulated charities	Please select
76 t	Shell banks	Please select
76 u	Travel and Tour Companies	Please select
76 v	Unregulated charities	EDD on risk-based approach
76 W	Used Car Dealers	Please select
76 x	Virtual Asset Service Providers	Please select
76 y	Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	Please select

78 a	If Y indicate who provides the approval:	Please select
79	Does the Entity have specific procedures for	
	onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Please select
30	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. MONI	TORING & 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 timely manner?	Please select
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Please select
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	
0 0437	TO A NODA DENCY	
9. PAYN 92	Does the Entity adhere to the Wolfsberg Group	
	mones the entity adhere to the vyolisperd Group	Please select

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Please select
93 b	Local Regulations	Please select
93 b1	If Y, specify the regulation	
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Please select
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Please select
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Please select
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
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 séléct
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 delect 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/lool?	
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	Please select
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Please select
104	What is the method used by the Entity?	Please select

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Please select
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Please select
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Please select
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Please select
106 d	European Union Consolidated List (EU)	Please select
106 e	Lists maintained by other G7 member countries	Please select
106 f	Other (specify)	
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Please select
107 b	Transactions	Please select
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	Please select
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section	
	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	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 Third parties to which specific FCC activities have	Please select
7.7	been outsourced	Please select
112 f	Non-employed workers (contractors/consultants)	Please select
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Please select
	that is targeted to specific roles, responsibilities and	
113	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.	#114 a - The training is delivered every two years or whenever there is relevant changes in AML-CFT regulation.
12. QUALIT	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	Governance	Please select
123 d	KYC/CDD/EDD and underlying methodologies	Please select
123 e	Name Screening & List Management	Please select
123 f	Reporting/Metrics & Management Information	Please select
123 g 123 h	Suspicious Activity Filing 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. FRAU	ID	
127	Does the Entity have policies in place addressing fraud risk?	Please select
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Please select

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

Declaration Statement

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

BANCO BILBAO VIZCAYA ARGENTARIA SA-PORTUE (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 taws, 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.

(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

I, _JORGE MANUEL CANHA CARVALHO LUIS ____ (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.

17 - 04 - 2025 (Signature & Date)

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

the Wolfsberg Group

Financial Institution Name: Location (Country):

Banco Bilbao Vizcaya Argentaria, S.A. Shanghai Branch China

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

No#	Question	Answer
I. ENTITY	& OWNERSHIP	
1	Full Legal Name	Banco Bilbao Vizcaya Argentaria, S.A. Shanghai Branch
2	Append a list of foreign branches which are covered by this questionnaire	BBVA Shanghai Branch
3	Full Legal (Registered) Address	4501,07,08 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	No commence of the Section of the Se
6 a	Publicly Traded (25% of shares publicly traded)	Please select
6 a1	If Y, indicate the exchange traded on and ticker symbol	Pidase select
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	1. 1.0000 0.100
7	% of the Entity's total shares composed of bearer shares	
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	Please select
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	Please select
10	Name of primary financial regulator/supervisory authority	National Administration of Financial Regulation People's Bank of China
11	Provide Legal Entity Identifier (LEI) if available	300300C1321131000022
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	

13	Jurisdiction of licensing authority and regulator of ultimate parent	
	Out of the business and the business and the state 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	No
14 f	Financial Markets Trading	Please select
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	Please select
14 j	Wealth Management	No
14 k	Other (please explain)	
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	Please select
15 a	If Y, provide the top five countries where the non- resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	1-50
16 b	Total Assets	Between \$10 and \$100 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Please select
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	
	UCTS & SERVICES	
19	Does the Entity offer the following products and services:	
19 a		
	Correspondent Banking	Please select
19 a1	Correspondent Banking If Y	Please select
19 a1 19 a1a		Please select Please select
19 a1a 19 a1b	If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships?	
19 a1a	If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to	Please select
19 a1a 19 a1b	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	Please select Please select
19 a1a 19 a1b 19 a1c	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	Please select Please select Please select
19 a1a 19 a1b 19 a1c 19 a1d	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	Please select Please select Please select Please select
19 a1a 19 a1b 19 a1c 19 a1d 19 a1e	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?	Please select Please select Please select Please select Please select
19 a1a 19 a1b 19 a1c 19 a1d 19 a1e	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	Please select Please select Please select Please select Please select Please select
19 a1a 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f 19 a1g	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)?	Please select Please select Please select Please select Please select Please select No
19 a1a 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f	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	Please select Please select Please select 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?	Please select
19 b	Cross-Border Bulk Cash Delivery	Please select
19 c	Cross-Border Remittances	Please select
19 d	Domestic Bulk Cash Delivery	Please select
19 e	Hold Mail	No No
19 f	International Cash Letter	No No
19 g	Low Price Securities	
19 h	The state of the s	Please select
19 ii	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 i3	Virtual Asset Service Providers (VASPs)	No
19 i4	eCommerce Platforms	No
19 i5	Other - Please explain	
19 j	Private Banking	N-
19 k	Remote Deposit Capture (RDC)	No Place select
19 K		Please select
17.5	Sponsoring Private ATMs	Please select
19 m	Stored Value Instruments	No
19 n	Trade Finance	Please select
19 o	Virtual Assets	No
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	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	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.
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.	Nil
	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	W 7223 C21 189-470-7
22 i	Policies and Procedures	Please select
22 j	PEP Screening	Please select
441	i rer scieening	Please select
22 k 22 l	Risk Assessment Sanctions	Please select Please select

22 m	Suspicious Activity Reporting	Please select
22 n	Training and Education	Please select
22 o	Transaction Monitoring	Please select
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	1-10
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Yes
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Please select
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Please select
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Please select
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	Local AML Policy is reviewed and approved by local senior management committee on annual basis.
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?	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 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	
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 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:	Division of the second
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 с	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 e 49 f	Prohibit dealing with another entity that provides	Please select
	Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for	

49 i	Define the process for escalating financial crime risk	
	issues/potentially suspicious activity identified by employees	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.	
	TF & SANCTIONS RISK ASSESSMENT	
6. AML, C	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 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	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Please select Please select
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: Transaction Monitoring Customer Due Diligence	Please select Please select Please select
54 a 54 b 54 c 54 d 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 a 54 b 54 c 54 d 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 Please select
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 e	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 a 54 a 54 b 54 c 54 c 55 a 55 a 55 b 55 c 55 c 55 c 55 f	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 Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g	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 Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 54 c 54 c 55 a 55 a 55 b 55 c 55 c 55 c 55 f	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 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 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	Please select
54 a 54 b 54 c 54 c 55 c 55 a 55 c 55 c 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	Please select
54 a 54 a 54 b 54 c 54 c 55 c 55 a 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 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 a 54 a 54 b 554 c 554 c 555 c 55 a 555 b 555 c 55 f 55 d 55 e 55 f 55 g 55 h 56 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	Please select
54 a 54 a 54 b 54 c 55 c 55 a 55 b 55 c 55 d 57 c 57 a 57 b 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 Channel	Please select
54 a 54 a 54 b 554 c 554 c 555 c 55 a 555 b 555 c 55 f 55 d 55 e 55 f 55 g 55 h 56 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	Please select
54 a 54 a 54 b 54 c 54 c 55 c 55 a 55 c 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h 56 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:	Please select
54 a 54 a 54 b 54 c 54 c 55 c 55 a 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 c 57 a 57 c 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: Customer Due Diligence	Please select
54 a 54 a 54 b 554 c 554 c 554 c 555 c 555 a 555 c 555 d 555 c 556 a 57 57 a 57 b 57 c 57 d 58 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	Please select
54 a 54 a 54 b 54 c 54 c 55 c 55 a 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 c 57 a 57 c 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: Customer Due Diligence	Please select

58 e	Name Screening	Diagon solvet
58 e 58 f	Name Screening	Please select
	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	Other relevant parties	Please select
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	Please select
67	Does the due diligence process result in customers receiving a risk classification?	Please select
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Please select
67 a2	Geography	Please select
67 a3	Business Type/Industry	Please select
67 a4	Legal Entity type	Please select
67 a5	Adverse Information	Please select
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Please select
68 a	If Y, is this at:	
68 a1	Onboarding	Please select
68 a2	KYC renewal	Please select
68 a3	Trigger event	Please select
68 a4	Other	Please select
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Please select
69 a	If Y, is this at:	
69 a1	Onboarding	Please select
69 a2	KYC renewal	Please select

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

78 2	If V indicate who provides the secretary	I plane and a d
78 a 79	If Y indicate who provides the approval:	Please select
19	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. MONI	TORING & 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 timely manner?	Please select
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Please select
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	
O DAME	ENT TRANSPARENCY	
	ENT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group	

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Please select
93 b	Local Regulations	Please select
93 b1	If Y, specify the regulation	PRC AML LAW
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Please select
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Please select
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Please select
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANO	CTIONS	
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	Please select
	against Sanctions Lists?	

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.	
11. TRAIN	IING & 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		Please select
111 d 111 e	terrorist financing and sanctions violations New issues that occur in the market, e.g. significant	900 000 0000 0000 0000 0000 0000 0000
	terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations	Please select
111 e 111 f 112	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
111 e 111 f 112 112 a	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 Please select
111 e 111 f 112 112 a 112 b	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 Please select Please select Please select Please select
111 e 111 f 112 112 a 112 b 112 c	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 e 111 f 112 112 a 112 b 112 c 112 d	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	Please select Please select Please select Please select Please select
111 e 111 f 112 112 a 112 b 112 c 112 d	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	Please select
111 e 111 f 112 a 112 b 112 c 112 d 112 e	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)	Please select
111 e 111 f 112 112 a 112 b 112 c 112 d 112 c	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?	Please select
111 e 111 f 112 a 112 b 112 c 112 d 112 e	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	Please select
111 e 111 f 112 112 a 112 b 112 c 112 d 112 c	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,	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.	
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	Governance	Please select
123 d 123 e	KYC/CDD/EDD and underlying methodologies Name Screening & List Management	Please select 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 123 l	Training & Education Other (specify)	Please 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

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

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

Declaration Statement

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

BANCO BILBAO VIZCAYA ARGENTARIA S.A Shangha (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.

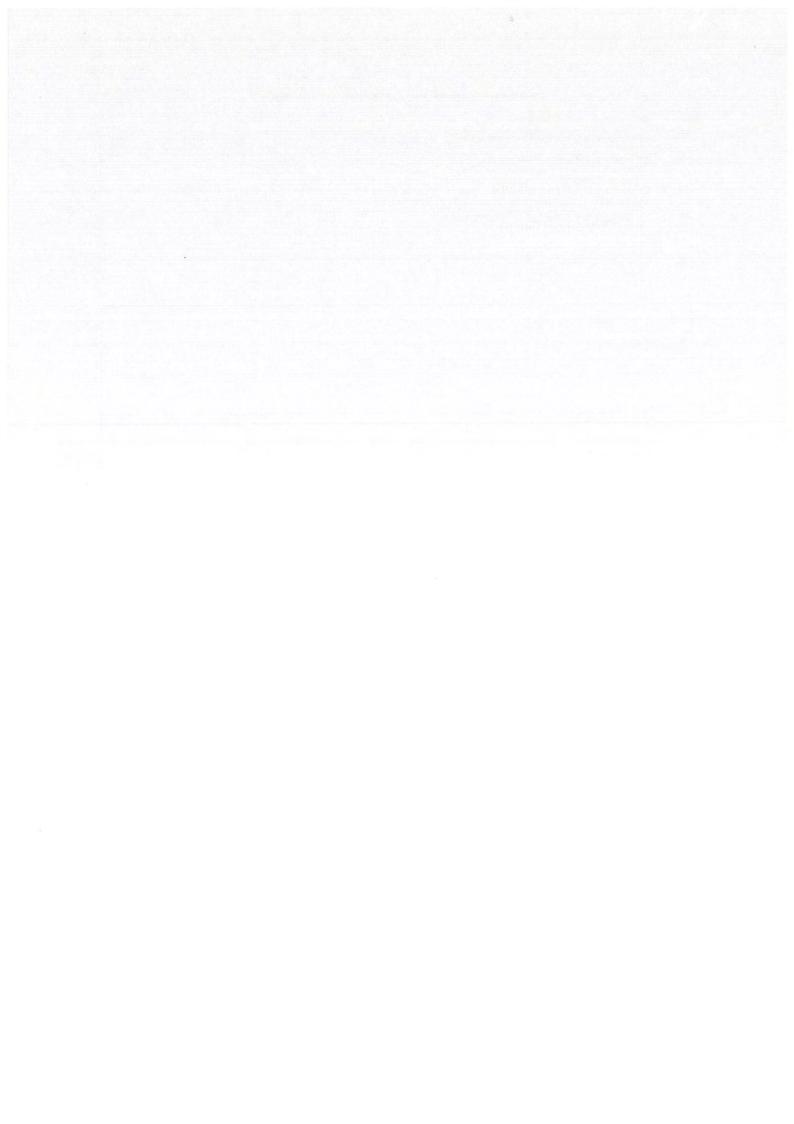
The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

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

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 on behalf of the Financi	
Institution.	and the second and second to the manufacture of the second and the	
I, Wenjie He	(MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in	this
Wolfsberg CBDDQ are complete and o	ct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.	
	(Signature & Date)	
() - 110 A	A TONE	
Musico,	(Signature & Date)	



the Wolfsberg Group

Financial Institution Name: Location (Country):

BBVA S.A., NEW YORK BRANCH				
USA				

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

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	
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	Two Manhattan West, 375 9th Avenue, 8th Floor, New York, NY 10001
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)	Please select
6 a1	If Y, indicate the exchange traded on and ticker symbol	I loade soller
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	New York State Department of Financial Services (NYDFS), and Federal Reserve Bank
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)	

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	Ptease 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
	Low Price Securities	
19 g		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?	Prease select
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	FX Third Party services are offered to our customers on a limited and exceptional basis
19 j	Private Banking	No 🗀
19 k	Remote Deposit Capture (RDC)	Please select
19 I	Sponsoring Private ATMs	Please select
19 m	Stored Value Instruments	No 🗖
19 n	Trade Finance	Please select
19 o	Virtual Assets	No -
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	No 🗖
19 p1a	If yes, state the applicable level of due diligence	Ptease 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	Piease 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)	FX Trading Third Party Demand Deposit Accounts (Checking, Savings)
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.	See https://www.bbvacib.com/es/due-diligence/ for global branches of BBVA S.A.
21	If appropriate, provide any additional information/context to the answers in this section.	Correspondent banking activities/services are only provided to BBVA SA.
3. AML. CT	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	Please select
22 b	Adverse Information Screening	Please select
22 c	Beneficial Ownership	Please select
22 d	Cash Reporting	No 🖃
22 e	CDD	Please select
22 f	EDD	
		Please select
22 g	Independent Testing	Please select
22 h	Periodic Review	Please select
22 i	Policies and Procedures	Please select
22 j	PEP Screening	Please select
22 k	Risk Assessment	Please select
221	Sanctions	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	No 🔽
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	See https://www.bbvacib.com/es/due-diligence/ for global branches of BBVA S.A.
45	If appropriate, provide any additional information/context to the answers in this section.	
P ASSI O	TF & SANCTIONS POLICIES & PROCEDURES	
5. AML, C		
40	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	Ptease 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?	Yes
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 N8Fls	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,	Please select
	exchanges houses, casa de cambio, bureaux de change or money transfer agents	Liegza zaierr
49 h	exchanges houses, casa de cambio, bureaux de	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	No 🔽
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional	See https://www.bbvacib.com/es/due-diligence/ for global branches of BBVA S.A.
	information/context to the answers in this section.	
7 KYC C	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
67	Does the due diligence process result in customers receiving a risk classification?	Ptease 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)	We also use the duration of the relationship, the current activity/trading volume, and the sanctions screening risk.
68	For high risk non-individual customers, is a site visit a part of your KYC process?	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 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 69 a1	If Y, is this at:	Plane colori
	Onboarding	Please select
69 a2	KYC renewal	Please select

	I was a little of the same of	
78 a	If Y indicate who provides the approval:	Please select
79	Does the Entity have specific procedures for	0
	onboarding entities that handle client money such as	No ▼
	lawyers, accountants, consultants, real estate agents?	
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	
01		Please select
	Section are representative of all the LE's branches	777/
81 a	If N, clarify which questions the difference/s relate to	See https://www.bbvacib.com/es/due-diligence/ for global branches of BBVA S.A.
	and the branch/es that this applies to	
82	If appropriate, provide any additional	The entities listed in 79 are not part of BBVA NY Branch customer base.
	information/context to the answers in this section.	
8. MONIT	ORING & REPORTING	
83	Does the Entity have risk based policies, procedures	
03		Diama adam
	and monitoring processes for the identification and	Please select
	reporting of suspicious activity?	
84	What is the method used by the Entity to monitor	Combination of automated and manual
	transactions for suspicious activities?	
	W	Chacks and Trade figures activities have manual menitories
84 a	If manual or combination selected, specify what	Checks and Trade finance activities have manual monitoring.
	type of transactions are monitored manually	
	Market de la continue de la desta de la continue de	
84 b	If automated or combination selected, are internal	Please select
64 D	system or vendor-sourced tools used?	
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is	Oracle FCCM
Q4 D1	·	
	the name of the vendor/tool?	
	110	
84 b2	When was the tool last updated?	< 1 year
0450	When wenths cutemated Transportion Manitoring	
84 b3	When was the automated Transaction Monitoring	Please select
	application last calibrated?	land the second
	Does the Entity have regulatory requirements to	
85		Please select
	report suspicious transactions?	
	MV describe Felitabette self-les secretions and	
85 a	If Y, does the Entity have policies, procedures and	
	processes to comply with suspicious transaction	Please select
	reporting requirements?	
	<u> </u>	
86	Does the Entity have policies, procedures and	
	processes to review and escalate matters arising from	Please select
ļ	the monitoring of customer transactions and activity?	
	and mering of designed deliagonoris and ability:	
87	Does the Entity have a data quality management	
91		Please select
	programme to ensure that complete data for all	F10430 3010Cl
	transactions are subject to monitoring?	
	Door the Estitutes are areas in class to second	
88	Does the Entity have processes in place to respond	
	to Request For Information (RFIs) from other entities	Please select
	in a timely manner?	
89	Does the Entity have processes in place to send	
35		Disease assistation
	Requests for Information (RFIs) to their customers in	Please select
	a timely manner?	
90	Confirm that all responses provided in the above	No No
	Section are representative of all the LE's branches	No
90 a	If N, clarify which guestions the difference/s relate to	See https://www.bbvacib.com/es/due-diligence/ for global branches of BBVA S.A.
	and the branch/es that this applies to	See Inthe-waw.obsechingenres.com/Seures on Bloom prancies of DDAV 2.V.
	and the ordinative that the apprice to	
91	If appropriate, provide any additional	
1	information/context to the answers in this section.	
	interinductive mexico die diswers in dis section.	
Q DAVIS	NT TRANSPARENCY	
92	,	I and the second
32	Does the Entity adhere to the Wolfsberg Group	Please select
	Payment Transparency Standards?	

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 с	Office of Financial Sanctions Implementation HMT (OFSI)	Please select
106 d	European Union Consolidated List (EU)	Ptease select
106 s	Lists maintained by other G7 member countries	Ptease 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.	See https://www.bbvacib.com/es/due-diligence/ for global branches of BBVA S.A.
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 1st Line of Defence	Please select
112 b 112 c	2nd Line of Defence	Please select
112 d	3rd Line of Defence	Please select Please select
112 e	Third parties to which specific FCC activities have been outsourced	Yes
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?	
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Please select
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	No

ac	o the Entity's processes include gathering dditional information to support its fraud controls, for	Please select
	xample: IP address, GPS location, and/or device ID?	
	onfirm that all responses provided in the above action are representative of all the LE's branches	No ·
	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	See https://www.bbvacib.com/es/due-diligence/ for global branches of BBVA S.A.
	appropriate, provide any additional formation/context to the answers in this section.	

Papidianali Aratalialit
Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4) Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)
BBVA S.A. NEW YORK BRANCH (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.
The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.
The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.
The Financial Institution commits to file accurate supplemental information on a timely basis.
(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.
, Kristine Cangcuesta (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)
1/1015 (5/5/25

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#		Answer
	TY & OWNERSHIP	
1	Full Legal Name	BANCO BILBAO VIZCAYA ARGENTARIA, S.A.
2	Append a list of foreign branches which are covered by this questionnaire	
3	Full Legal (Registered) Address	80 RAFFLES PLACE #55-02 UOB PLAZA 1 048624
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	28 MAR 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	

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	The state of the s
14 g	Securities Services/Custody	No
14 g	Broker/Dealer	No .
	The second secon	Please select
14 i	Multilateral Development Bank	Please select
14 j	Wealth Management	Please select
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 , South Korea ,Ireland ,Netherland and Poland
46	Salast the alexant value	
16	Select the closest value:	
16 a	Number of employees	1-50
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Please select
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	
2. PROD	UCTS & SERVICES	
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	No
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	Please select
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	Please select
10 -1		
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Please select
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with	Please select
	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking	
19 a1d	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	Please select
19 a1d 19 a1e	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	Please select Please select
19 a1d 19 a1e 19 a1f	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	Please select Please select
19 a1d 19 a1e 19 a1f 19 a1g	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	Please select Please select
19 a1d 19 a1e 19 a1f 19 a1g	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)?	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?	Please select
19 b	Cross-Border Bulk Cash Delivery	Please select
19 c	Cross-Border Remittances	Please select
19 d	Domestic Bulk Cash Delivery	Please select
19 e	Hold Mail	No No
19 f	International Cash Letter	375
	Low Price Securities	No Standard
19 g		Please select
19 h	Payable Through Accounts	Please select
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	No
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	Please select
19 i3	Virtual Asset Service Providers (VASPs)	Please select
19 i4	eCommerce Platforms	Please select
19 i5	Other - Please explain	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	Please select
191	Sponsoring Private ATMs	Please select
19 m	Stored Value Instruments	
		No Steen select
19 n	Trade Finance	Please select
19 o	Virtual Assets	No
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	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 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	Arr
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
		Please select
22 f	I FDD	
22 f	EDD Independent Testing	
22 g	Independent Testing	Please select
22 g 22 h	Independent Testing Periodic Review	Please select Please select
22 g 22 h 22 i	Independent Testing Periodic Review Policies and Procedures	Please select Please select Please select
22 g 22 h	Independent Testing Periodic Review	Please select Please select
22 g 22 h 22 i	Independent Testing Periodic Review Policies and Procedures	Please select Please select Please select

Page 3

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?	Disease select
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select 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 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	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		
40 0	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Please select
40 с	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,	CTF & SANCTIONS POLICIES & PROCEDURES Has the Entity documented policies and procedures	
	CTF & SANCTIONS POLICIES & PROCEDURES	
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:	Please select
46 a	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: Money laundering	Please select
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 46 b	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: Money laundering Terrorist financing	Please select
46 a 46 b 46 c	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: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at	Please select Please select
46 a 46 b 46 c 47	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: 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 a 46 b 46 c 47	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: 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 a 46 b 46 c 47 48	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: 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 a 46 b 46 c 47 48 48 a 48 a	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: 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 Please select Please select Please select Please select Please select
46 a 46 a 46 b 46 c 47 48 48 a 48 a1 48 b	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: 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 a 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b	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: 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 a 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b 49	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: 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 a 46 a 46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 a	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: 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 a 46 a 46 b 46 c 47 48 48 a 48 a 48 b 49 b 49 c	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: 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	Please select
46 a 46 a 46 b 46 c 47 48 48 a 48 a1 48 b 48 b1 49 49 a	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: 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 a 46 a 46 b 46 c 47 48 48 a 48 a 48 a 49 b 49 c 49 d	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: 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? 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	Please select
46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 a 49 b 49 c 49 d 49 e	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: 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 opening and keeping of accounts for Prohibit dealing with another entity that provides services to shell banks	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
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	
54	TF & SANCTIONS RISK ASSESSMENT Does the Enlity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 54 a	TF & SANCTIONS RISK ASSESSMENT Does the Enlity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Please select
54 a 54 b	TF & SANCTIONS RISK ASSESSMENT Does the Enlity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Please select
54 a 54 b 54 c	TF & SANCTIONS RISK ASSESSMENT Does the Enlity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Please select Please select
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
54 a 54 b 54 c	TF & SANCTIONS RISK ASSESSMENT Does the Enlity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Please select Please select
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 Does the Entity's AML & CTF EWRA cover the	Please select Please select
54 a 54 b 54 c 54 d 55 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:	Please select Please select Please select
54 a 54 b 54 c 54 d 55 c	TF & SANCTIONS RISK ASSESSMENT Does the Enlity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Enlity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Please select Please select Please select Please select
54 a 54 b 54 c 54 d 55 d 55 a 55 a 55 c 55 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	Please select Please select Please select Please select Please select
54 a 54 b 54 c 54 d 55 c	TF & SANCTIONS RISK ASSESSMENT Does the Enlity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Enlity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Please select
54 a 54 a 54 b 54 c 54 c 55 d 55 a 55 b 55 c 55 d 55 f	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	Please select
54 a 54 b 54 c 54 d 55 5 a 55 b 55 c 55 d 55 e	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
54 a 54 a 54 b 54 c 54 c 55 d 55 a 55 b 55 c 55 d 55 f	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
54 a 54 a 54 b 54 c 54 c 55 d 55 a 55 a 55 c 55 d 55 c 55 d 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
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 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 Governance Management Information Has the Entity's AML & CTF EWRA been completed	Please select
54 a 54 a 54 b 55 4 c 54 d 55 55 a 55 5 b 55 5 c 55 5 d 55 6 55 5 g 55 5 h 56	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
54 a 54 a 54 b 554 c 554 c 555 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56	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.	Please select
54 a 54 a 54 b 54 c 54 c 55 d 55 a 55 b 55 c 55 d 55 f 55 g 55 h 56 56 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: 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.	Please select
54 a 54 a 54 b 554 c 54 c 55 c 55 a 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 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: 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 a 54 a 54 b 554 c 554 c 555 c 55 a 55 b 55 c 55 d 55 f 55 g 55 h 56 a 57 57 a 57 b 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
54 a 54 a 54 b 554 c 54 c 55 c 55 a 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 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: 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	Please select
54 a 54 a 54 b 554 c 554 c 555 c 55 a 55 b 55 c 55 d 55 f 55 g 55 h 56 a 57 57 a 57 b 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 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Please select
54 a 54 a 54 b 55 c 55 a 55 b 55 c 55 d 55 c 55 d 55 f 55 g 55 h 56 a 57 a 57 a 57 a 57 a 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 controls	Please select
54 a 54 a 54 b 55 d c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 c 57 a 57 c 57 d 58 8	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 controls effectiveness components detailed below: Customer Due Diligence	Please select



58 e	Name Screening	Please select
58 f	Transaction Screening	Please select
58 g	Training and Education	Please select
59 g	Has the Entity's Sanctions EWRA been completed in	Please select
29	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	Please select Please select
67	applied to beneficial ownership identification? 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:	
67.04		Places coloct
67 a1	Product Usage	Please select Please select
67 a2 67 a3	Geography 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

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

78 a	If Y indicate who provides the approval:	Please select
79	Does the Entity have specific procedures for	17.0000 001001
	onboarding entities that handle client money such as	No
	lawyers, accountants, consultants, real estate agents?	
30	Does the Entity perform an additional control or	Please select
	quality review on clients subject to EDD?	T TOUGO GOLOU
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	79 - Singapore branch is into Wholesale Banking activities and we do not have lawyers,
	and the branch/es that this applies to	accountants, consultants and real estate agents as customers.
82	If appropriate, provide any additional information/context to the answers in this section.	
B. MONI	TORING & 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?	Manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	Trade Finance related transactions are monitored for suspicious activity by -subjecting the bills of lading to sample verification -monitoring the vessel voyage from port of loading until port of discharge -subjecting the counter party to pre-clearance process before accepting the transaction
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
39	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	Name screening -combination of manual and automated system Suspicious activity identification - Manual
91	If appropriate, provide any additional information/context to the answers in this section.	
PAYM	ENT TRANSPARENCY Does the Entity adhere to the Wolfsberg Group	



•	D # 5 # 1	
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	Disease select
93 b		Please select
	Local Regulations	Please select
93 b1	If Y, specify the regulation	MAS Notice 626 - Paragraph 11
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	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. SAN	CTIONS	
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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405	Describe Falls by the second of the second o	
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 с	Office of Financial Sanctions Implementation HMT (OFSI)	Please select
106 d	European Union Consolidated List (EU)	Please select
106 e	Lists maintained by other G7 member countries	Please select
106 f	Other (specify)	MAS Alert List and Payment blocking under Gambling Control Act Order 2023
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Please select
107 b	Transactions	Please select
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	Please select
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	
	ING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Please select
111 Ь	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Please select
111 с	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 112 c	1st Line of Defence 2nd Line of Defence	Please select
112 c	3rd Line of Defence	Please select 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?	
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Please select
114 a	If Y, how frequently is training delivered?	Please select
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select



115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
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	Please select
123 d	KYC/CDD/EDD and underlying methodologies Name Screening & List Management	Please select 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 123 l	Training & Education Other (specify)	Please 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. FRAU	JD	
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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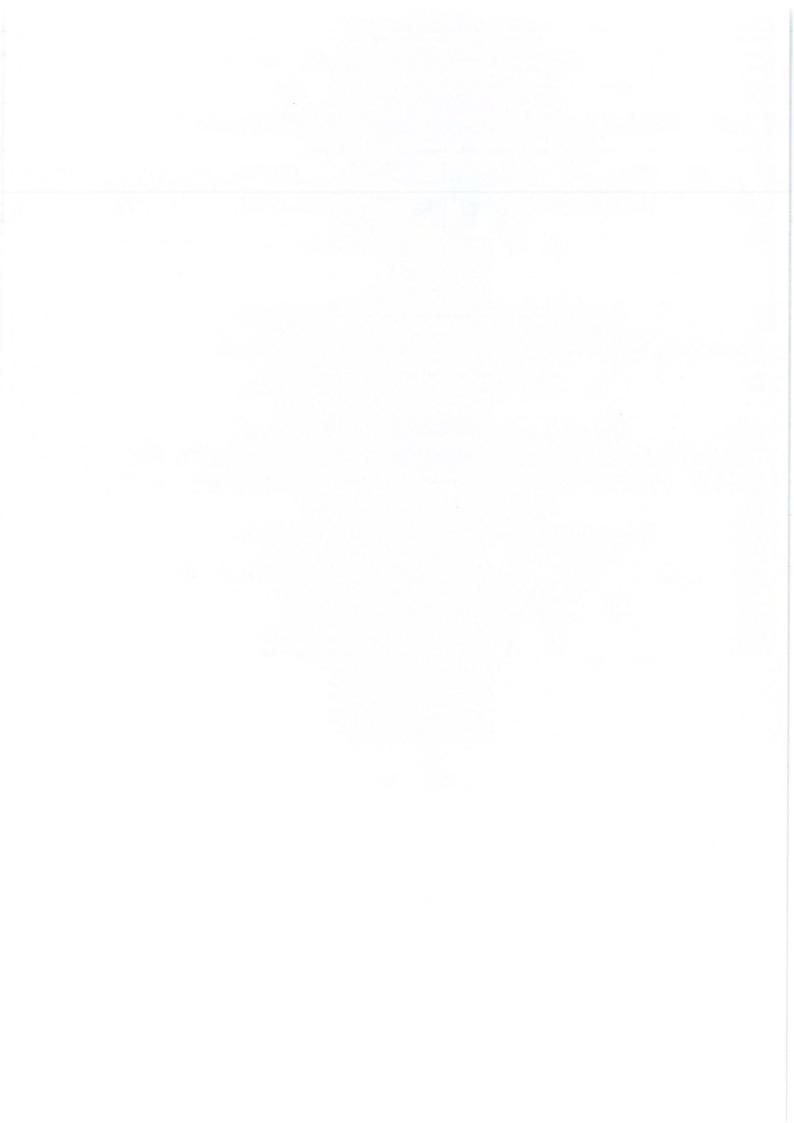
	fraud?	Please select
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Please select
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Please 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 G Declaration		ting or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of
Wolfsberg G Declaration Anti- Money	Stroup Correspondent Banking Due Diligence Questionnaire 2023 (CE Statement (To be signed by Global Head of Correspondent Bank v Laundering, Chief Compliance Officer, Global Head of Financial	ing or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Crimes Compliance OR equivalent)
Wolfsberg G Declaration Anti- Money BANCO BI	Froup 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 ILBAO VIZCAYA ARGENTARIA, S.A. (Financial Instituti	ting or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of
Wolfsberg G Declaration Anti- Money BANCO Bl every effort The Financ	Stroup 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 ILBAO VIZCAYA ARGENTARIA, S.A. (Financial Institution to remain in full compliance with all applicable financial crime laws	ring or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Crimes Compliance OR equivalent) on name) is fully committed to the fight against financial crime and makes
Wolfsberg G Declaration Anti- Money BANCO Bl every effort The Financ legal and re	Froup 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 LEBAO VIZCAYA ARGENTARIA, S.A. (Financial Institution to remain in full compliance with all applicable financial crime laws ital Institution understands the critical importance of having effecting ulatory obligations.	ing or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Crimes Compliance OR equivalent) 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.
Wolfsberg G Declaration Anti- Money BANCO Bl every effort The Financ legal and re The Financ standards.	Froup 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 LEBAO VIZCAYA ARGENTARIA, S.A. (Financial Institution to remain in full compliance with all applicable financial crime laws ital Institution understands the critical importance of having effectingulatory obligations.	crimes Compilance OR equivalent) In name) is fully committed to the fight against financial crime and makes are regulations and standards in all of the jurisdictions in which it does business and holds accounts. The area of the sustainable controls to combat financial crime in order to protect its reputation and to meet its are parties to transactions in international payments and has adopted/is committed to adopting these are with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles.
Wolfsberg G Declaration Anti- Money BANCO Bl every effort The Financ legal and re The Financ standards. The Financ The informa	Froup 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 LIBAO VIZCAYA ARGENTARIA, S.A. (Financial Institution to remain in full compliance with all applicable financial crime laws ial Institution understands the critical importance of having effectingulatory obligations. In Institution recognises the importance of transparency regardinal Institution further certifies it complies with / is working to compliate the signal of t	crimes Compliance OR equivalent) on name) is fully committed to the fight against financial crime and makes are regulations and standards in all of the jurisdictions in which it does business and holds accounts. The and sustainable controls to combat financial crime in order to protect its reputation and to meet its against to transactions in international payments and has adopted/is committed to adopting these with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles.

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

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Does the Entity have real time monitoring to detect



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

the Wolfsberg Group

Financial Institution Name: Location (Country) :

BANCO BILBAO VIZCAYA ARGENTARIA SA FRANCE

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

No#	Question	Answer
I. ENTIT	Y & 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	FRANCE
3	Full Legal (Registered) Address	29 Avenue de l'Opéra 75001 Paris - FRANCE
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	1902
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Please select
6 a1	If Y, indicate the exchange traded on and ticker symbol	Tidad dilect
6 b	Member Owned/Mutual	Please select
6 c	Government or State Owned by 25% or more	Please select
6 d	Privately Owned	Please select
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	Please select
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	Please select
10	Name of primary financial regulator/supervisory authority	Banque de France / ACPR (Autorité de Contrôle Prudentiel et de Résolution)
11	Provide Legal Entity Identifier (LEI) if available	894500247KEMA0HHP26
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	
	TO COMPANY CONTRACTOR OF THE PARTY OF THE PA	
4.4	Select the business areas applicable to the Entity	
14		In.
14 a	Retail Banking	No
14 b	Private Banking	No
14 c	Commercial Banking	Please select
14 d	Transactional Banking	Please select
14 e	Investment Banking	Please select
14 f	Financial Markets Trading	Please select
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	Please select
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	
	Cata (presso s.p.a.r.)	
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	Please select
15 a	If Y, provide the top five countries where the non- resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	51-200
16 b	Total Assets	Please select
17	Confirm that all responses provided in the above	
35	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 PPONI	UCTS & SERVICES	
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	No
19 a1	If Y	No
19 a1a	Does the Entity offer Correspondent Banking	Please select
	I services to domestic banks?	riease select
19 a1b	services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships?	Please select
	Does the Entity allow domestic bank clients to	
19 a1c	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	Please select
19 a1c	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	Please select Please select
19 a1c 19 a1d 19 a1e	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	Please select Please select Please select
19 a1c 19 a1d 19 a1e	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	Please select Please select Please select Please select
19 a1c 19 a1d 19 a1e 19 a1f 19 a1g	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	Please select Please select Please select Please select Please select
19 a1c 19 a1d 19 a1e 19 a1f 19 a1g	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	Please select Please select Please select Please select Please select
19 a1b 19 a1c 19 a1d 19 a1e 19 a1f 19 a1f 19 a1h 19 a1h 19 a1h1 19 a1h2	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)?	Please select Please select Please select 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?	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
	Low Price Securities	
19 g		No
19 h	Payable Through Accounts	Please select
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	No
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	Please select
19 i3	Virtual Asset Service Providers (VASPs)	Please select
19 i4	eCommerce Platforms	Please select
19 15	Other - Please explain	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	Please select
19 I	Sponsoring Private ATMs	Please select
19 m	Stored Value Instruments	No
19 n	Trade Finance	Please select
19 o	Virtual Assets	No 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	Please select
19 p1a	If yes, state the applicable level of due diligence	Please select
	Wire transfers	
19 p2		Please select
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p3	Foreign currency conversion	Please select
19 p3a	If yes, state the applicable level of due diligence	Please select
19 p4	Sale of Monetary Instruments	Please select
19 p4a	If yes, state the applicable level of due diligence	Please select
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	N/A
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Please select
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	
3. AML, C	Does the Entity have a programme that sets minimum	
	AML, CTF and Sanctions standards regarding the following components:	Y.
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
-94 2.7	I EDD	
22 f	EDD Independent Testing	Please select
22 f 22 g	Independent Testing	Please select
22 f 22 g 22 h	Independent Testing Periodic Review	Please select Please select
22 f 22 g 22 h 22 i	Independent Testing Periodic Review Policies and Procedures	Please select
22 f 22 g 22 h 22 i	Independent Testing Periodic Review	Please select Please select
22 f 22 g 22 h 22 i 22 j 22 k	Independent Testing Periodic Review Policies and Procedures	Please select Please select Please select

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

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Please select
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Please select
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Please select
40 e	Changes in business activities that may materially increase the Entity's corruption risk	No
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Please select
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Please select
42 b	1st Line of Defence	Please select
42 c	2nd Line of Defence	Please select
42 d	3rd Line of Defence	Please select
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	No
42 f	Non-employed workers as appropriate (contractors/consultants)	No
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Please select
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
44 a	If N, clarify which questions the difference/s relate to and the 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	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	
48 a	procedures against:	
	U.S. Standards	Please select
48 a1	U.S. Standards If Y, does the Entity retain a record of the results?	Please select Please select
48 b	U.S. Standards If Y, does the Entity retain a record of the results? EU Standards	Please select Please select
48 b 48 b1	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
48 b	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 Please select
48 b 48 b1 49	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 Please select Please select
48 b 48 b1 49 49 a	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	Please select Please select Please select Please select Please select
48 b 48 b1 49 49 a 49 b	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
48 b 48 b1 49 49 a 49 b	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	Please select Please select Please select Please select Please select
48 b 48 b1 49 49 a 49 b 49 c 49 d	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 opening and keeping of accounts for	Please select
48 b 48 b1 49 49 a 49 b 49 c 49 d 49 e	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

40 .	Define the process for exceletion for a lateral to the state of the st	
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.	
S AMI C	TE & SANCTIONS DISK ASSESSMENT	
6. AML, C 54	TF & SANCTIONS RISK ASSESSMENT 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	Please select
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 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 Please select
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 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 Please select
54 a 54 b 54 c 54 d 55 d 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	Please select Please select Please select Please select
54 a 54 b 54 c 54 d 55 d 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 a 54 b 54 c 54 d 55 d 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 PEP Identification Transaction Screening Name Screening against Adverse Media/Negative	Please select
54 a 54 b 54 c 55 d 55 a 55 b 55 c 55 d 55 e	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 a 54 a 54 b 54 c 54 c 55 a 55 a 55 b 55 c 55 d 55 c 55 f	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 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e	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 a 54 a 54 b 54 c 54 c 55 a 55 a 55 b 55 c 55 d 55 c 55 f	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 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 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 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 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	Please select
54 a 54 a 54 b 54 c 54 c 55 c 55 a 55 b 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 h 56 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 a 54 a 54 b 554 c 554 c 554 c 555 a 555 a 555 c 555 d 555 c 556 a 556 a 57 57 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 Product	Please select
54 a 54 a 54 b 554 c 554 d 55 55 a 555 b 555 c 555 d 555 e 55 f 55 g 55 h 56 56 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	Please select
54 a 54 a 54 b 554 c 554 c 554 c 555 a 555 a 555 c 555 d 555 c 556 a 556 a 57 57 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 Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	Please select
54 a 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c 55 d 55 f 55 g 55 h 56 56 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:	Please select
54 a 54 a 54 b 55 c 55 a 55 c 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c 57 d 57 a 57 a 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: Customer Due Diligence	Please select
54 a 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c 55 d 55 f 55 g 55 h 56 56 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:	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	Please select
	the last 12 months?	Flease 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 64 e	Ownership structure	Please select
64 f	Product usage Purpose and nature of relationship	Please select
64 g	Source of funds	Please select Please select
64 h	Source of wealth	Please select
65	Are each of the following identified:	T tease select
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	Please select
67	applied to beneficial ownership identification? Does the due diligence process result in customers	Please select
	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 67 a4	Business Type/Industry	Please select
67 a5	Legal Entity type Adverse Information	Please select Please select
67 a6	Other (specify)	Tidase scient
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

00.00	1 74	Disconnection
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 5 years or more	Please select Please select
74 a4	Trigger-based or perpetual monitoring reviews	Please select
74 a6	Other (Please specify)	Product Science
75	Does the Entity maintain and report metrics on current	
	and past periodic or trigger event due diligence reviews?	Please select
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Do not have this category of customer or industry
76 b	Respondent Banks	Do not have this category of customer or industry
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Pleese select
76 c	Embassies/Consulates	Do not have this category of customer or industry
76 d	Extractive industries	No EDD/restriction or prohibition
76 e	Gambling customers	Do not have this category of customer or industry
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Do not have this category of customer or industry
76 h	MSB/MVTS customers	Do not have this category of customer or industry
76 i	Non-account customers	Do not have this category of customer or industry
76 j	Non-Government Organisations	Do not have this category of customer or industry
76 k	Non-resident customers	Please saled
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 o	PEP Close Associates	Please select
76 p	PEP Related	Please select
76 q	Precious metals and stones	Do not have this category of customer or industry
78 r	Red light businesses/Adult entertainment	Do not have this category of customer or industry
76 s	Regulated charities	Do not have this category of customer or industry
76 t	Shell banks	Do not have this category of customer or industry
76 u	Travel and Tour Companies	Please select
76 v	Unregulated charities	Do not have this category of customer or industry
76 w	Used Car Dealers	Do not have this category of customer or industry
76 x	Virtual Asset Service Providers	Do not have this category of customer or industry
76 y	Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	Please select

78 a	If Y indicate who provides the approval:	Please select
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	No
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Please select
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
82	If appropriate, provide any additional information/context to the answers in this section.	We identify beneficial owners according to the requirements of French legislation.
8. MONI	TORING & 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?	MTS / DATAMART
84 b2	When was the tool last updated?	Other - Please explain (in Question 91)
84 b3	When was the automated Transaction Monitoring application last calibrated?	Please select
85	Does the Entity have regulatory requirements to report suspicious transactions?	Please select
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Please select
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Please select
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Please select
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Please select
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Please select
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	Tools are maintained and updated by from the Parent Company
9. PAYM 92	ENT TRANSPARENCY	
~~	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	Disco soled
93 a 93 b	Local Regulations	Please select
93 b1	If Y, specify the regulation	Please select
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	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. SAN	CTIONS	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Please select
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Please select
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Please select
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Please select
102	What is the method used by the Entity for sanctions screening?	Please select
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Please select
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	Please select
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Please select
104	What is the method used by the Entity?	Please select

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Please select
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Please select
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Please select
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Please select
106 d	European Union Consolidated List (EU)	Please select
106 e	Lists maintained by other G7 member countries	Please select
106 f	Other (specify)	
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Please select
107 b	Transactions	Please select
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	Please select
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	
	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?	Please select
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Please select
114 a	If Y, how frequently is training delivered?	Please select
115	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches	Please select

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
12. QUALIT	Y 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	Governance	Please select
123 d 123 e	KYC/CDD/EDD and underlying methodologies Name Screening & List Management	Please select Please select
123 e	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 123 l	Training & Education Other (specify)	Please 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. 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
		l

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 Declaratio	tion Statement Group Correspondent Banking Due Diligence Questionnaire 2023 (Cl n Statement (To be signed by Global Head of Correspondent Banl by Laundering, Chief Compliance Officer, Global Head of Financial	king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of
Wolfsberg Declaratio Anti- Mone BANCO E every effo	Group Correspondent Banking Due Diligence Questionnaire 2023 (Cl n Statement (To be signed by Global Head of Correspondent Ban ny Laundering, Chief Compliance Officer, Global Head of Financial BILBAO VIZCAYA ARGENTARIA SA (Financial Institut nt 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 Crimes 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.
Wolfsberg Declaratio Anti- Mone BANCO E every effo The Finan legal and r	Group Correspondent Banking Due Diligence Questionnaire 2023 (Cl n Statement (To be signed by Global Head of Correspondent Banking Laundering, Chief Compliance Officer, Global Head of Financial SILBAO VIZCAYA ARGENTARIA SA (Financial Institutent to remain in full compliance with all applicable financial crime law cial Institution understands the critical importance of having effecting egulatory obligations.	king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Crimes 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
Wolfsberg Declaratio Anti- Mone BANCO E every effo The Finan legal and r	Group Correspondent Banking Due Diligence Questionnaire 2023 (Clin Statement (To be signed by Global Head of Correspondent Banking Laundering, Chief Compliance Officer, Global Head of Financial Laundering, Chief Compliance Officer, Global Head of Financial SILBAO VIZCAYA ARGENTARIA SA (Financial Instituter to remain in full compliance with all applicable financial crime law cial Institution understands the critical importance of having effecting egulatory obligations.	king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Crimes 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.
Wolfsberg Declaratio Anti- Mone BANCO E every effo The Finan legal and r The Finan standards The Finan	Group Correspondent Banking Due Diligence Questionnaire 2023 (CI n Statement (To be signed by Global Head of Correspondent Banking Laundering, Chief Compliance Officer, Global Head of Financial SILBAO VIZCAYA ARGENTARIA SA (Financial Instituter to remain in full compliance with all applicable financial crime law cial Institution understands the critical importance of having effective egulatory obligations. Cial Institution recognises the importance of transparency regarding.	king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Crimes 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 against the parties to transactions in international payments and has adopted/is committed to adopting these by with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles.
Wolfsberg Declaratio Anti- Mone BANCO E every effo The Finan legal and r The Finan standards The Finan The Inform	Group Correspondent Banking Due Diligence Questionnaire 2023 (CIn Statement (To be signed by Global Head of Correspondent Banking Laundering, Chief Compliance Officer, Global Head of Financial Laundering, Chief Compliance Officer, Global Head of Financial Institut It to remain in full compliance with all applicable financial crime law cial Institution understands the critical importance of having effective egulatory obligations. Cial Institution recognises the importance of transparency regarding the critical institution further certifies it complies with / is working to complication in the compliance of transparency regarding the critical institution further certifies it complies with / is working to comp	king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Crimes 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 ag parties to transactions in international payments and has adopted/is committed to adopting these by with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles.
Wolfsberg Declaratio Anti- Mone BANCO E every effo The Finan legal and r The Finan The Inform The Finan The Inform The Finan	Group Correspondent Banking Due Diligence Questionnaire 2023 (CI n Statement (To be signed by Global Head of Correspondent Banking Laundering, Chief Compliance Officer, Global Head of Financial SILBAO VIZCAYA ARGENTARIA SA (Financial Institute to remain in full compliance with all applicable financial crime law cial Institution understands the critical importance of having effecti egulatory obligations. cial Institution recognises the importance of transparency regardir cial Institution further certifies it complies with / is working to comp lation provided in this Wolfsberg CBDDQ will be kept current and of cial Institution commits to file accurate supplemental information or	king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Crimes 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 ag parties to transactions in international payments and has adopted/is committed to adopting these by with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. Will be updated no less frequently than every eighteen months. In a timely basis.
Wolfsberg Declaratio Anti- Mone BANCO E every effo The Finan legal and r The Finan The Inform The Finan The Inform The Finan	Group Correspondent Banking Due Diligence Questionnaire 2023 (Clin Statement (To be signed by Global Head of Correspondent Banking Laundering, Chief Compliance Officer, Global Head of Financial Laundering, Chief Compliance Officer, Global Head of Financial Institut It to remain in full compliance with all applicable financial crime law cial Institution understands the critical importance of having effective egulatory obligations. Cial Institution recognises the importance of transparency regarding in the critical institution further certifies it complies with / is working to complete in this Wolfsberg CBDDQ will be kept current and compliance of the compliance of the complete information of the compliance of the compliance of the complete information of the complete in this Wolfsberg CBDDQ are complete and correct to the co	king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Crimes 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 ag parties to transactions in international payments and has adopted/is committed to adopting these by with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles.

(Signature & Date)

23/04/2025

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

the Wolfsberg Group

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

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

No#	Question	Answer
	& OWNERSHIP	
1	Full Legal Name	Description of the Control of the Co
		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, Germany
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	
C =	chart if available	
6 a1	Publicly Traded (25% of shares publicly traded) If Y, indicate the exchange traded on and ticker symbol	Please select
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	
В	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	Germany Federal Financial Supervisory Authority (BaFin)
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	Yes
14 b	Private Banking	No
14 c	Commercial Banking	Please select
14 d	Transactional Banking	Please select
14 e	Investment Banking	Please select
14 f	Financial Markets Trading	Please select
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	Please select
14 j	Wealth Management	No
14 k	Other (please explain)	
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	Please select
15 a	If Y, provide the top five countries where the non- resident customers are located.	
10	0.1	
16	Select the closest value:	
16 a	Number of employees	51-200
16 b	Total Assets	Please select
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Please select
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	
2 PRODI	UCTS & SERVICES	
19	Does the Entity offer the following products and	
	services:	
19 a	services: Correspondent Banking	No
P. D. CO.	A AND COLORS CO.	No
19 a1	Correspondent Banking	No Please select
19 a1 19 a1a	Correspondent Banking If Y Does the Entity offer Correspondent Banking	
19 a1 19 a1a 19 a1b	Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to	Please select
19 a1 19 a1a 19 a1b 19 a1c	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	Please select Please select
19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d	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	Please select Please select Please select
19 a1 19 a1a 19 a1b 19 a1c 19 a1d	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	Please select Please select Please select Please select
19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e	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?	Please select Please select Please select Please select Please select
19 a1 19 a1a 19 a1b 19 a1c	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 downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	Please select Please select Please select Please select Please select Please select
19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f 19 a1g	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	Please select Please select Please select Please select Please select Please select
19 a1 19 a1b 19 a1c 19 a1d 19 a1d 19 a1e 19 a1f	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)?	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 No
	Low Price Securities	
19 g		Please select
19 h	Payable Through Accounts	Please select
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	No
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	Please select
19 i3	Virtual Asset Service Providers (VASPs)	Please select
19 i4	eCommerce Platforms	Please select
19 i5	Other - Please explain	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	Please select
19 I	Sponsoring Private ATMs	Please select
19 m	Stored Value Instruments	No
19 n	Trade Finance	Please select
19 o	Virtual Assets	No
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	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	
19 p2a	Foreign currency conversion	Please select
19 p3a	If yes, state the applicable level of due diligence	No Standard
19 p3a	Sale of Monetary Instruments	Please select
19 p4a	If yes, state the applicable level of due diligence	No 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.	No
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	BBVA S.A., Niederlassung Deutshcland
21	If appropriate, provide any additional information/context to the answers in this section.	
3. AML, C	CTF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 a 22 b	Appointed Officer with sufficient experience/expertise Adverse Information Screening	Please select Please select
22 C	Beneficial Ownership	Please select
22 d	Cash Reporting	
		Please select
22 e	CDD	Please select
22 f	EDD	Please select
22 g	Independent Testing	Please select
22 h	Periodic Review	Please select
22	Policies and Procedures	Please select
22 J	PEP Screening	Please select
22 k	Risk Assessment	Please select
22	Sanctions	Please select
7.		

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	No
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	BBVA S.A., Niederlassung Deutschland
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:	1 loads solest
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Please select
35 b	Includes enhanced requirements regarding interaction with public officials?	Please select
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Please select
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Please select
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Please select
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Please select
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Please select
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Please select
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Please select

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Please select
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Please select
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Please select
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Please select
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Please select
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Please select
42 b	1st Line of Defence	Please select
42 c	2nd Line of Defence	Please select
42 d	3rd Line of Defence	Please select
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Please select
42 f	Non-employed workers as appropriate (contractors/consultants)	Please select
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Please select
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
5. AML, C 46	TF & 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	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

140 :	Define the present for analytic formatic to the	
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 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	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, C	TF & SANCTIONS RISK ASSESSMENT	
6. AML, C 54	TF & SANCTIONS RISK ASSESSMENT 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	Please select
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	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Please select Please select
54 a 54 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	Please select
54 a 54 b 54 c 54 d 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:	Please select Please select 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 Please select Please select
54 a 54 b 54 c 54 d 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	Please select Please select Please select
54 a 54 b 54 c 54 d 55 d 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	Please select
54 a 54 b 54 c 54 d 55 55 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 Please select Please select Please select Please select
54 a 54 a 54 b 54 c 54 c 55 c 55 a 55 c 55 c 55 d 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	Please select
54 a 54 a 54 b 554 c 554 c 555 c 55 a 55 c 55 d 55 c 55 f 55 g	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 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e	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 a 54 a 54 b 54 c 554 d 55 55 a 55 b 55 c 55 d 55 c 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	Please select
54 a 54 b 54 c 54 d 55 c 55 d 55 c 55 d 55 e 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	Please select
54 a 54 a 54 b 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 56 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.	Please select
54 a 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 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:	Please select
54 a 54 a 54 b 554 c 554 d 555 55 a 555 b 555 c 55 f 55 g 55 h 56 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: Client	Please select
54 a 54 a 54 b 554 c 554 d 555 55 a 555 b 555 c 55 f 55 g 55 f 55 6 56 a 57 57 a 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	Please select
54 a 54 a 54 b 55 4 c 55 4 c 55 5 55 a 55 5 b 55 5 c 55 5 d 55 5 c 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 EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Please select
54 a 54 a 54 b 55 d c 55 d c 55 d 55 5 a 55 b 55 c 55 d 55 f 55 g 55 h 56 56 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	Please select
54 a 54 a 54 b 55 c 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a 57 57 a 57 b 57 c 57 d 58 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	Please select
54 a 54 a 54 b 554 c 554 c 554 d 55 55 a 555 c 55 d 555 c 55 f 55 g 55 h 56 56 a 57 57 a 57 a 57 c 57 c 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: Customer Due Diligence	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.	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 65 d	Key controllers	Please select
66 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:	0.5 (
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?	
71 a	If Y, is this at:	
71 a1	Onboarding	Please select
71 a2	KYC renewal	Please select
71 a3	Trigger event	Please select
72	What is the method used by the Entity to screen PEPs?	Please select
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Please select
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Please select
74 a	If yes, select all that apply:	
74 a1	Less than one year	Please select
74 a2	1 – 2 years	Please select
74 a3	3 – 4 years	Please select
74 a4	5 years or more	Please select
74 a5	Trigger-based or perpetual monitoring reviews	Please select
74 a6	Other (Please specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Please select
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Please select
76 b	Respondent Banks	Please select
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Please select
76 c	Embassies/Consulates	Please select
76 d	Extractive industries	Please select
76 e	Gambling customers	Please select
76 f	General Trading Companies	Please select
76 g	Marijuana-related Entities	Please select
76 h	MSB/MVTS customers	Please select
76 I	Non-account customers	Please select
76 j	Non-Government Organisations	Please select
76 k	Non-resident customers	Please select
76 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)	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	r idade deidU
	onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Please select
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Please select
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	BBVA S.A., Niederlassung Deutschland
82	If appropriate, provide any additional information/context to the answers in this section.	Local procedure applicable as required
8. MONI	TORING & 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 timely manner?	Please select
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Please select
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	
9. PAYMI	ENT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group	

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Please select
93 b	Local Regulations	Please select
93 b1	If Y, specify the regulation	
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Please select
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Please select
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Please select
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SAN	CTIONS	
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

Select the Sanctions Lists used by the Entity in its sanctions screening processes: 105 a		Please select	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	105
Sanctions List (UN) Flease select				106
Foreign Assets Control (CPAC)		Please select		106 a
Circle 106 d European Union Consolidated List (EU)		Please select		106 Ь
106 f		Please select	(OFSI)	106 c
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. brianches, substidianes, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or GY member countries have enacted comprehensive jurisdiction-based Sanctions? 109 Confirm that all responses provided in the above Section are representative of life to the LE's branches 109 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 110 If appropriate, provide any additional information/context to the answers in this section. 111 Does the Entity provide mandatory training, which includes: 111 a Identification and reporting of transactions to government authorities grovernment authorities provide mandatory training, which includes: 111 b Examples of different forms of money laundering, terrorist finanching and sanctions violations relevant for the types of products and services offered 111 c Internal policies for controlling money laundering, terrorist finanching and sanctions violations regulations 111 New issues that occur in the market, e.g. significant regulatory actions or new regulations 111 Fraud Please select 112 a Board and Senior Committee Management Please select 112 a Sort Line of Defence Please select 112 a Sort Line of Defence Please select 113 a Cities of Defence Please select 114 a Please select 115 Please select 116 Please select 117 a Sort Line of Defence Please select 118 a Screen Add Senior Committee Management 119 Please select 110 Please select 111 a Sort Line of Defence Please select 112 a Sort Line of Defence Please select 113 a Sort Line of Defence Please select 114 a Sort Line of Defence Please select 115 a Sort Line of Defence Please select		Please select		
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 107 b Transactions Please select 108 Dest he Entity have a physical presence, e.g. branches, substitiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions? 109 Confirm that all responses provided in the above Section are representative of all the LE's branches 109 a IN, 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. TRAINING & EDUCATION 111 Does the Entity provide mandatory training, which includes: 111 a Menification and reporting of transactions to government authorities povernment authorities provides any additional information/context of the answers in this section. 111 b Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered 111 c Internal policies for controlling money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered 111 c Internal policies for controlling money laundering, terrorist financing and sanctions violations please select 111 e Conduct and Culture Please select 111 e Conduct and Culture Please select 112 a Board and Senior Committee Management Please select 112 b Ist thes of Defence Please select 112 a Source and Senior Committee Management Please select 112 a Third parties to which specific FCC activities have		Please select		A A STATE AND POLICE
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 108 Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions? 109 Confirm that all responses provided in the above Section are representative of all the LE's branches 110 If appropriate, provide any additional information/context to the answers in this section. 111 Does the Entity provide mandatory training, which includes: 111 a Identification and reporting of transactions to government authorities 111 b Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered 111 c Internal policies for controlling money laundering, terrorist financing and sanctions violations 111 d New issues that occur in the market, e.g. significant regulatory actions or new regulations 111 e Conduct and Culture Please select 112 a Board and Senior Committee Management Please select 112 b Ist Line of Defence Please select			Other (specify)	106 f
Transactions Does the Entity have a physical presence, e.g. Does the Entity have a physical presence, e.g. Please select Please select Please select Please select Please select Does the Entity have a physical presence, e.g. Please select Por Member countries have enacted comprehensive jurisdiction-based Sanctions? Does 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 N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide mandatory training, which includes: If a dentification and reporting of transactions to government authorities If a dentification and reporting of transactions to government authorities If a dentification and reporting of transactions relevant for the types of products and services offered If a linernal policies for controlling money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered If a linernal policies for controlling money laundering, terrorist financing and sanctions violations Please select If a conduct and Culture Please select Please select Please select If a Board and Senior Committee Management Please select If a Board and Senior Committee Management Please select If a St Line of Defence Please select Third parties to which specific FCC activities have			Sanctions list, how many business days before the entity updates their active manual and/or automated	107
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 170 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. 111 Does the Entity provide mandatory training, which includes: 111 a Identification and reporting of transactions to government authorities 111 b Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered 111 c Internal policies for controlling money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered 111 d New issues that occur in the market, e.g. significant regulatory actions or new regulations 111 f Fraud Please select 111 Fraud Please select 112 is the above mandatory training provided to: 112 a Board and Senior Committee Management Please select 112 c 2nd Line of Defence Please select 112 a Third parties to which specific FCC activities have		Please select	Customer Data	107 a
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		Please select	Transactions	
Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. Information/con	•	No	branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted	108
and the branch/es that this applies to. If appropriate, provide any additional Information/context to the answers in this section. Infor		No		109
Information/context to the answers in this section. 11. TRAINING & EDUCATION 11. Does the Entity provide mandatory training, which includes: 11. Identification and reporting of transactions to government authorities 11. Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered 11. Internal policies for controlling money laundering, terrorist financing and sanctions violations 11. New issues that occur in the market, e.g. significant regulatory actions or new regulations 11. Conduct and Culture 11. Fraud 11. Please select 11. Fraud 11. Please select 11. Is the above mandatory training provided to: 11. Is the above mandatory training provided to: 11. Is the above mandatory training provided to: 11. Is the of Defence 11. Please select 11. Please select 11. Please select 11. Internal policies for controlling money laundering, terrorist financing and sanctions violations 11. Please select		BBVA S.A., Niederlassung Deutschland		109 a
Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities				110
includes: Identification and reporting of transactions to government authorities It is provided to: Internal policies for controlling 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 Internal policies for controlling money laundering, terrorist financing and sanctions violations Internal policies for controlling money laundering, terrorist financing and sanctions violations Please select Please select Please select Please select Please select Internal policies for controlling money laundering, terrorist financing and sanctions violations Please select Please select Please select Please select Internal policies for controlling money laundering, terrorist financing and sanctions violations Please select Please select Please select Internal policies for controlling money laundering, terrorist financing and sanctions violations Please select Please select Please select Internal policies for controlling money laundering, terrorist financing and sanctions violations Please select Please select				
government authorities Please select				111
terrorist financing and sanctions violations relevant for the types of products and services offered 111 c Internal policies for controlling money laundering, terrorist financing and sanctions violations 111 d New issues that occur in the market, e.g. significant regulatory actions or new regulations 111 e Conduct and Culture Please select 111 f Fraud Please select 112 lis 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 113 d Third parties to which specific FCC activities have		Please select		111 a
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 In Fraud Please select Is the above mandatory training provided to: Board and Senior Committee Management Please select It a Board and Senior Committee Management Please select It in of Defence Please select It in of Defence Please select It in of Defence Please select Third parties to which specific FCC activities have		Please select	terrorist financing and sanctions violations relevant	111 Ь
regulatory actions or new regulations Please select 111 e Conduct and Culture Please select 111 f Fraud Please select 112 lis 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 d Third parties to which specific FCC activities have		Please select		111 c
111 f Fraud Please select 112		Please select	regulatory actions or new regulations	
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 Please select Please select 112 e Third parties to which specific FCC activities have Please select Please select 112 e Third parties to which specific FCC activities have Please select Ple		Please select		
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 d Third parties to which specific FCC activities have		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				
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				
112 d 3rd Line of Defence Please select 112 e Third parties to which specific FCC activities have				
112 e Third parties to which specific FCC activities have			The second of th	
been outsourced		Please select	A STATE OF THE STA	CA W
112 f Non-employed workers (contractors/consultants) Please select	- A	Please select	Non-employed workers (contractors/consultants)	112 f
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 AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and	113
114 Does the Entity provide customised training for AML, CTF and Sanctions staff? Please select		Please select	Does the Entity provide customised training for AML,	114
114 a If Y, how frequently is training delivered? Please select		Please select		
Confirm that all responses provided in the above Section are representative of all the LE's branches Please select		Please select		115

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.
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.	In addition to the Group programme, the Compliance function at BBVA S.A., Niederlassung Deutschland maintains a local control plan and conducts regular and periodic reviews.
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 u	KYC/CDD/EDD and underlying methodologies Name Screening & List Management	Please select 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]	Transaction Screening including for sanctions	Please select
123 k 123 l	Training & Education Other (specify)	Please 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,	
4. FRAU	D	
127	Does the Entity have policies in place addressing fraud risk?	Please select
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Please select

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

Declaration Statement Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4) Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent) BBVA SA., Niederlassung Deutschland (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts. The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations. The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards. The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months. The Financial Institution commits to file accurate supplemental information on a timely basis. (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

BBVA

I, Marek Kilian, Head of Compliance & AML Germany (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

Marek Kilian, Head of Compliance & AML Germany

Banco Bilbao Vizcaya Argentaria, S.A.

Niederlassung Deutschland Neue Mainzer Str. 28 60311 Frankfurt

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

the Wolfsberg Group

Financial Institution Name: Location (Country): Banco Bilbao Vizcaya Argentaria S.A., London Branch United Kingdom

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

No#	Question	Answer
. 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	Banco Bilbao Vizcaya Argentaria S.A., London Branch
3	Full Legal (Registered) Address	One Canada Square, 44th Floor Canary Wharf London E14 5AA United Kingdom
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	London Branch established in 1918
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	Fidase select
6 b	Member Owned/Mutual	Please select
6 c	Government or State Owned by 25% or more	Please select
6 d	Privately Owned	Please select
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	Please select
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	Please select
10	Name of primary financial regulator/supervisory authority	Financial Conduct Authority & Prudential Regulatory Authority
11	Provide Legal Entity Identifier (LEI) if available	5493000ITT4HB63XLV65
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	Spain
	ultimate parent	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Please select
14 b	Private Banking	No.
14 c	Commercial Banking	100
14 d		Please select
7.1-	Transactional Banking	Please select
14 e	Investment Banking	Please select
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	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	Please select
15 a	where bank services are provided) If Y, provide the top five countries where the non- resident customers are located.	
	(SOSON SOSON	
16	Select the closest value:	
16 a	Number of employees	201-500
16 b	Total Assets	Please select
17	Confirm that all responses provided in the above	T (MAN) SULLOW
	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. PRODI	UCTS & SERVICES	
19	Does the Entity offer the following products and services:	
10		
19 a	Correspondent Banking	No
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	Please select
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	Please select
	The same design and a support of the same state	
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Please select
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with	Please select
19 a1d	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking	
	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	Please select
19 a1d 19 a1e 19 a1f	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	Please select Please select
19 a1d 19 a1e 19 a1f 19 a1g	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	Please select Please select Please select
19 a1d 19 a1e 19 a1f 19 a1g	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	Please select Please select Please select
19 a1d 19 a1e	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)?	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?	Please select
19 b	Cross-Border Bulk Cash Delivery	Please select
19 c	Cross-Border Remittances	Please select
19 d	Domestic Bulk Cash Delivery	Please select
19 e	Hold Mail	Please select
19 f	International Cash Letter	Please select
19 g	Low Price Securities	
-	E CONTRACTOR DE	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?	Please select
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	Please select
19 n	Trade Finance	Please select
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:	No
40.44		ALC:
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.	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.	
3 VMI	CTF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	Please select
22 b	Adverse Information Screening	Please select
22 c	Beneficial Ownership	Please select
22 d	Cash Reporting	Please select
22 e	CDD	Please select
22 f	EDD	
		Please select
22 g	Independent Testing	Please select
22 h	Periodic Review	Please select
22 i	Policies and Procedures	Please select
22 j	PEP Screening	Please select
22 k	Risk Assessment	Please select
221	Sanctions	Please select
	- I was a second of the second	Contract Con

22 m	Suspicious Activity Reporting	Please select
22 n	Training and Education	Please select
22 o	Transaction Monitoring	Please select
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	1-10
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Please select
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Please select
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Please select
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Please select
28	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Please select
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	
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?	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 а	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.	
	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a		
4.4	Money laundering	Piease select
46 b	Money laundering Terrorist financing	Please select
46 b	Terrorist financing	Please select
46 b 46 c 47		
46 c	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at	Please select Please select
46 c 47	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 c 47 48	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 Please select
46 c 47 48	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
46 c 47 48 48 a 48 a1	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 Please select Please select Please select Please select
46 c 47 48 48 a 48 a 48 a1 48 b	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 c 47 48 48 a 48 a 48 a 48 b 48 b 48 b 49	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 c 47 48 48 a 48 a 48 a1 48 b	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 retain a record of the results?	Please select
46 c 47 48 48 a 48 a 48 a 48 b 48 b 48 b 49 a	Terrorist financing Sanctions violations Are the Entity's policles 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 c 47 48 48 a 48 a 48 a 48 b 48 b 49 a 49 b	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	Please select
46 c 47 48 48 a 48 a 48 a 48 b 48 b 49 a 49 b 49 c	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 Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
46 c 47 48 48 a 48 a 48 a 48 b 48 b 49 a 49 b	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	Please select
46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 a 49 c 49 d 49 e	Terrorist financing Sanctions violations Are the Entity's policles 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 opening and keeping of accounts for	Please select

49 î	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.	
6. AML, C	TF & 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 54 d	Channel	Please select
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 55 h	Governance Management Information	Please select 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	effectiveness components detailed below: Customer Due Diligence	Please select
58 b	effectiveness components detailed below: Customer Due Diligence Governance	Please select
	effectiveness components detailed below: Customer Due Diligence	

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:	Section 2.1 Text of the section 2.1
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 65 d	Key controllers Other relevant parties	Please select Please select
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	Please select
67	Does the due diligence process result in customers receiving a risk classification?	Please select
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Please select
67 a2	Geography	Please select
67 a3	Business Type/Industry	Please select
67 a4	Legal Entity type	Please select
67 a5	Adverse Information	Please select
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Please select
68 a	If Y, is this at:	
68 a1	Onboarding	Please select
68 a2	KYC renewal	Please select
68 a3	Trigger event	Please select
68 a4 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?	
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
		Do not have this category of customer or industry
76 g	Marijuana-related Entities	
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	Do not have this category of customer or industry
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	Do not have this category of customer or industry
76 r	Red light businesses/Adult entertainment	Do not have this category of customer or industry
76 s	Regulated charities	Please select
76 t	Shell banks	Please select
76 u	Travel and Tour Companies	Please select
76 v	Unregulated charities	Do not have this category of customer or industry
76 w	Used Car Dealers	Do not have this category of customer or industry
76 x	Virtual Asset Service Providers	Please select
76 y	Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	Please select

78 a	If Y Indicate who provides the approval:	Please select
79	Does the Entity have specific procedures for	Elongs district
	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. MONI	TORING & 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?	Combination of automated and manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	In addition to the automated monitoring provided by Group-level systems, the Compliance Department of the London Branch undertakes sample testing of transactions that are high value or have a nexus to high risk jurisdictions.
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Please select
84 b1	If "Vendor-sourced tool" or "Both" selected, what is the name of the vendor/tool?	
84 b2	When was the tool last updated?	Please select
84 b3	When was the automated Transaction Monitoring application last calibrated?	Please select
85	Does the Entity have regulatory requirements to report suspicious transactions?	Please select
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Please select
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Please select
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Please select
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Please select
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Please select
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	
. P	THE TO LUCK APPLICATION	
9. PAYM	ENT TRANSPARENCY	
	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:	
00		
93 a	FATF Recommendation 16	Please select
93 b	Local Regulations	Please select
93 b1	If Y, specify the regulation	The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017
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. SANO	CTIONS	
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
	against Sanctions Lists?	

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)	Pléase 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.	
11.TRAIN	IING & 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?	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	
17	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.	
12. QUALIT	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based	Leader to the second se
	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?	Pleasé séléct
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 123 e	KYC/CDD/EDD and underlying methodologies Name Screening & List Management	Please select 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.	
4. FRAU	D	
127	Does the Entity have policies in place addressing fraud risk?	Please select
128	Does the Entity have a dedicated team responsible	Please select

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

Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)

Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti-Money Laundering, Chief Compilence Officer, Global Head of Financial Crimes Compilence OR equivalent)

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

(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.

[_Clive Buckman (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)

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

the Wolfsberg Group

Location (Country) :

Financial Institution Name:
Location (Country):

BANCO BILBAO VIZCAYA ARGENTARIA S.A., TOKYO BRANCH
JAPAN

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
	& OWNERSHIP	
1	Full Legal Name	
2	Append a list of foreign branches which are covered	
	by this questionnaire	
	The state of the s	
3	Full Legal (Registered) Address	
,	I di Legal (Negisteres) Negisteres	
_	Full Primary Business Address (if different from	
4	above)	
	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)	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	Please select
	an Offshore Banking License (OBL)?	Please Select
8 a	If Y, provide the name of the relevant branch/es	
1011	which operate under an OBL	
9	Does the Bank have a Virtual Bank License or	Blacce colort
	provide services only through online channels?	Please select
10	Name of primary financial regulator/supervisory	Financial Services Agency
	authority	Timenolar doi vidos rigoritoy
	T	
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)	
	Indifferent from the Engly Completing the Open	
	different from the Entity completing the 55Q)	

13	Jurisdiction of licensing authority and regulator of	
	ultimate parent	
	O. L. other beautiful and the Court	
4	Select the business areas applicable to the Entity	
4 a	Retail Banking	No
4 b	Private Banking	No
14 c	Commercial Banking	Please select
14 d	Transactional Banking	No
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	Please select
14 j	Wealth Management	No.
14 k	Other (please explain)	140
14 K	Cuter (prease expraint)	
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	Please select
15 a	If Y, provide the top five countries where the non- resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	Please select
16 b	Total Assets	Please select
17	Confirm that all responses provided in the above	i ibase select
"	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. PRODU	JCTS & SERVICES	
19	Does the Entity offer the following products and	
	services:	
19 a	Correspondent Banking	No
19 a 19 a1		No
19 a1	Correspondent Banking	No Please select
19 a1 19 a1a	Correspondent Banking If Y Does the Entity offer Correspondent Banking	
19 a1 19 a1a 19 a1b	If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to	Please select
	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	Please select Please select
19 a1 19 a1a 19 a1b 19 a1c	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	Please select Please select Please select
19 a1 19 a1a 19 a1b 19 a1c 19 a1d	Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank dients 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	Please select Please select Please select Please select
19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d	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?	Please select Please select Please select Please select Please select
19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e	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	Please select
19 a1 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f 19 a1f	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 forer Correspondent Banking services 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)?	Please select
19 a1 19 a1a 19 a1b 19 a1c	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	Please select Please select Please select Please select Please select Please select

19 a1ī	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	Please select
19 c	Cross-Border Remittances	No
19 d	Domestic Bulk Cash Delivery	Please select
19 e	Hold Mail	No
19 f	International Cash Letter	No
19 g	Low Price Securities	Please select
19 h	Payable Through Accounts	Please select
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	No
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	No
19 i3	Virtual Asset Service Providers (VASPs)	No
19 i4	eCommerce Platforms	No
19 i5	Other - Please explain	
19]	Private Banking	No
19 k	Remote Deposit Capture (RDC)	Please select
19 I	Sponsoring Private ATMs	Please select
19 m	Stored Value Instruments	No
19 n	Trade Finance	Please select
19 o	Virtual Assets	No.
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	NO.
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	Please select
	Wire transfers	No
19 p2		
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.	Tokyo Branch does not offer any services to walk-in customers.
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.	
3. AML, (CTF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	Please select
22 b	Adverse Information Screening	Please select
22 c	Beneficial Ownership	Please select
	Cash Reporting	Please select
22 d		1 10000 001001
		Disease select
22 e	CDD	Please select
22 e 22 f	CDD EDD	Please select
22 e 22 f	CDD	
22 e 22 f 22 g	CDD EDD	Please select
22 f 22 g	CDD EDD Independent Testing	Please select Please select
22 e 22 f 22 g 22 h 22 i	CDD EDD Independent Testing Periodic Review Policies and Procedures	Please select Please select Please select Please select
22 e 22 f 22 g 22 h	CDD EDD Independent Testing Periodic Review	Please select Please select 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?	Please select
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	Please select
	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. 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?	Please select
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Please select
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Please select
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Please select
34	is the Entity's ABC programme applicable to:	Please select
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Please select
35 b	Includes enhanced requirements regarding interaction with public officials?	Please select
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Please select
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Please select
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Please select
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Please select
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Please select
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Please select
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Please select

40 b	Corruption risks associated with the countries and	
	industries in which the Entity does business, directly or through intermediaries	Please select
40 с	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 Enlity'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, 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	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 49 a	Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous	Please select
49 b	and fictitious named accounts 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 d	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
40 -		
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remitlance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	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.	
C AND C	TF & 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	Channel Geography	
54 d 55	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Please select
54 d 55 55 a	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Please select Please select Please select
54 d 55 55 a 55 b	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Please select Please select Please select Please select
54 d 55 55 a 55 b 55 c	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 Please select
54 d 55 55 a 55 b	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	Please select Please select Please select Please select
54 d 55 55 a 55 b 55 c 55 d 55 e	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 d 55 55 a 55 b 55 c 55 d 55 e	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 d 55 55 a 55 b 55 c 55 d 55 e	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 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g	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 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	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
55 d 55 a 55 b 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 h	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
54 d 55 55 a 55 b 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 a	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	Please select
55 d 55 a 55 b 55 b 55 c 55 c 55 d 55 e 55 g 55 h 56 a 57	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 d 55 55 a 55 b 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 57 a 57 b 57 c	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	Please select
54 d 55 55 a 55 b 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57 57 a 57 b 57 c 57 d	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
55 d 55 a 55 b 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 a 57 c 57 c 57 c	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
55 d 55 a 55 b 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 c 57 c 57 d 58 a	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	Please select
55 d 55 a 55 b 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 a 57 c 57 c 57 c	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

58 c	Name Screening	Disago colect
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	Other relevant parties	Please select
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	Please select
67	Does the due diligence process result in customers receiving a risk classification?	Please select
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Please select
67 a2	Geography	Please select
67 a3	Business Type/Industry	Please select
67 a4	Legal Entity type	Please select
67 a5	Adverse Information	Please select
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Please select
68 a	If Y, is this at:	
68 a1	Onboarding	Please select
68 a2	KYC renewal	Please select
68 a3	Trigger event	Please select
68 a4	Other	Please select
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Please select
69 a	If Y, is this at:	
69 a1	Onboarding	Please select
69 a2	KYC renewal	Please select

69 a3	Trigger event	Please select
70	What is the method used by the Entity to screen for	
	Adverse Media/Negative News?	Please select
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
71 a	If Y, is this at:	
71 a1	Onboarding	Please select
71 a2	KYC renewal	Please select
71 a2	Trigger event	Please select
72		
	What is the method used by the Entity to screen PEPs?	Please select
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Please select
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Please select
74 a	If yes, select all that apply:	
74 a1	Less than one year	Please select
74 a2	1 – 2 years	Please select
74 a3	3 – 4 years	Please select
74 a4	5 years or more	No
74 a5	Trigger-based or perpetual monitoring reviews	Please select
74 a6	Other (Please specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Please select
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Please select
76 b	Respondent Banks	Please select
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Please select
76 c	Embassies/Consulates	Please select
76 d	Extractive industries	Please select
		Please select
76 e	Gambling customers	
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
		Please select
76 I	Nuclear power	
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)	Thouse school
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 79	Does the Entity have specific procedures for	1 10000 COUNTY
	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
B1	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	
62	If appropriate, provide any additional information/context to the answers in this section.	
8. MONI	TORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Please select
B4	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	As Tokyo Branch does not provide payment services to the clients and the number of other transactions is very few, all transactions are monitored manually.
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Please select
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	
84 b2	When was the tool last updated?	Please select
84 b3	When was the automated Transaction Monitoring application last calibrated?	Please select
85	Does the Entity have regulatory requirements to report suspicious transactions?	Please select
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Please select
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Please select
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Please select
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Please select
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Please select
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	
	CALL TO AN OD A DELLOW	
9. PAYM 92	ENT TRANSPARENCY Does the Entity adhere to the Wolfsberg Group	

93	Does the Entity have policies, procedures and processes to comply with and have controls in place	
	to ensure compliance with:	
93 a	FATF Recommendation 16	Please select
93 b	Local Regulations	Please select
93 b1	If Y, specify the regulation	
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Please select
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Please select
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Please select
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SAN	CTIONS	
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 Dala	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/conlext 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 a		Please select Please select
	government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant	
111 b 111 c 111 d	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	Please select Please select
111 b 111 c 111 d	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
111 b 111 c 111 d 111 e 111 f	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	Please select Please select
111 b 111 c 111 d 111 e 111 f 112	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 Please select Please select Please select Please select
111 b 111 c 111 d 111 e 111 f 112 112 a	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 Please select Please select Please select Please select Please select
111 b 111 c 111 d 111 e 111 f 112 112 a 112 b	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	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 e 111 f 112 112 a 112 b	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	Please select
111 b 111 c 111 d 111 e 111 f 112 112 b 112 c 112 d 112 c	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	Please select
111 b 111 c 111 d 111 e 111 f 112 a 112 b 112 c 112 d 112 e	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?	Please select
111 b 111 c 111 d 111 e 111 f 112 c 112 a 112 b 112 c 112 d 112 e	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	Please select
111 b 111 c 111 d 111 e 111 f 112 a 112 b 112 c 112 d 112 e	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,	Please select

	Lawrence and a rest of the Lawrence	
115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	In 1400 - 1	
116	If appropriate, provide any additional information/context to the answers in this section.	
12. QUALIT	Y 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	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 g	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. FRAU	In .	
IT. IRAU		
127	Does the Entity have policies in place addressing fraud risk?	Please select

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а	Do the Entity's processes include gathering	
е	additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	No
	Confirm that all responses provided in the above section are representative of all the LE's branches	Please select
	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	f appropriate, provide any additional nformation/context to the answers in this section.	

Declaration Statement Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4) Doclaration 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. [Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration on behalf of the Financial Institution. [Refinencial Institution on the Financial Institution on the Financial Institution. [Signature & Date] [Signature & Date] [Signature & Date]



Financial Institution Name:	
Location (Country) :	

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	
2	Append a list of foreign branches which are covered	
	by this questionnaire	
3	Full Legal (Registered) Address	
	an Logar (regionarou) / nauross	
4	Full Primary Business Address (if different from	
4	above)	
	above)	
5	Date of Entity incorporation/establishment	
6	Select type of ownership and append an ownership	
	chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	
6 b	Member Owned/Mutual	
6 c	Government or State Owned by 25% or more	
6 d	Privately Owned	
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer	
	shares	
8	Does the Entity, or any of its branches, operate under	
	an Offshore Banking License (OBL)?	
8 a	If Y, provide the name of the relevant branch/es	
o a	which operate under an OBL	
	million operate and all object	
0	Does the Bank have a Virtual Bank License or	
9	provide services only through online channels?	
40		
10	Name of primary financial regulator/supervisory authority	
	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)	
	1	l .

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

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	
19 c	Cross-Border Remittances	
19 d	Domestic Bulk Cash Delivery	
19 e	Hold Mail	
19 f	International Cash Letter	
19 g	Low Price Securities	
19 h	Payable Through Accounts	
19 i	Payment services to non-bank entities who may	
	then offer third party payment services to their customers?	
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	
19 j	Private Banking	
19 k	Remote Deposit Capture (RDC)	
19 I	Sponsoring Private ATMs	
19 m	Stored Value Instruments	
19 n	Trade Finance	
19 o	Virtual Assets	
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	
19 p4a 19 p5	If yes, state the applicable level of due diligence If you offer other services to walk-in customers	
19 þ5	please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	
3. AML, C	TF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum	
	AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	
22 b	Adverse Information Screening	
22 c	Beneficial Ownership	
22 d	Cash Reporting	
22 e	CDD	
22 f	EDD	
22 g	Independent Testing	
22 h	Periodic Review	
22 i	Policies and Procedures	
22 j	PEP Screening	
22 k	Risk Assessment	
22 I	Sanctions	

27 Taming and Excellent 28 How many full sine employees are in the Entity's MAL, CTF & Sanctions Deployees are in the Entity's AMA, CTF & Sanctions Deploy approved attested annually by the Body or equivalent Senior or equivalent Senior annually by the Body or equivalent Senior Senior Senior or equivalent Senior Senior Senior or equivalent Senior Seni	22 m	Suspicious Activity Reporting	
22 a many full stime employees are in the Entity's AMU, CTF & Sanctions Compliance (Part AMU, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Monagement (Part AMU, CTF & Sanctions policy product at least annually by the Board or equivalent Senior Monagement (Part AMU, CTF & Sanctions policy product at least annually by the Board or equivalent Senior Monagement (Part AMU, CTF, & Sanctions programmer) 25 a Compliance (Part AMU, CTF & Sanctions programmer) 26 a Fy provide further details 27 Does the annual product of the AMU, CTF & Sanctions programmer? 28 a Fy provide further details 28 a Fy provide further details 29 Confirm that all responses provided at the above Socious are applications of at the LES branches Socious are applications of a socious are applications of a socious are applications of a socious are applications or applications of a socious are applications or			
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regular reporting on the satus of the AML_CTF, & Sanctions programme? 26	24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice	
components of the AML, CTF & Sanctions programme? If Y, provide further details If Y, provide further details If Y, provide further details Confirm that all responses provided in the above Section are representative of all the LES tranches Section are representative of all the LES tranches If N, Clarify which questions the difference's relate to and the branch'se that this applies to. If A, Clarify which questions the difference's relate to and the branch'se that this applies to. If Appropriate, provide any additional information information context to the answers in this section. If appropriate, provide any additional information and in	25	regular reporting on the status of the AML, CTF, &	
27 Does the entity have a whistleblower policy? 28 Confirm that all responses provided in the above Section are representative of all the LEP tranches Section are representative of all the LEP tranches. 28 a If N, darify which questions the difference's relate to and the tranches that this applies to. 29 If appropriate, provide any additional information-context to the answers in this section. 29 If appropriate, provide any additional information-context to the answers in this section. 20 ANTI BRIBERY & CORRUPTION 30 Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and sport bibdry and corruption? 31 Does the Entity have an enterprise wide programme that sets minimum ABC standards? 32 Has the Entity appointed a designated officer or officers with sufficient representative propriative separative to the Entity have adjusted in a propriate to the Entity have adjusted and appropriate to the Entity have adjusted and appropriate to the Entity have adjusted and propriate to the Entity have adjusted and propriate to the Entity have adjusted and propriate to the Entity have adjusted ABC programme? 33 Does the Entity have adjusted ABC policy that: 35 Des the Entity have adjusted ABC policy that: 36 Prohibits the giving and receiving of brines? This includes promising, ordering, giving, solicitation or receiving of anything of value, clientify or indirectly, if improperly intended to influence addition or obtain an advertinge. 36 Des the Entity have adjusted to influence addition or obtain an advertinge. 37 Does the Entity have controls in place to monitor the effectiveness of the ABC programme? 38 If If provide the date to when the last ABC EVRA was completed. 40 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? 40 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent ri	26		
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components detailed below: 40 a Potential liability created by intermediaries and		is the net result of the controls effectiveness and the inherent risk assessment?	
		components detailed below:	
	40 a		

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

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

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

69 a3	Trigger event	
69 a3 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 74 a5	5 years or more Trigger-based or perpetual monitoring reviews	
74 a5	Other (Please specify)	
7440	Offer (Flease 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?	

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

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
00 -	'	
93 a	FATF Recommendation 16	
93 b	Local Regulations	
93 b1	If Y, specify the regulation	
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	
95 a	If Y, does the Entity have procedures to include 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 Sanctions List (UN)	
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	
106 с	Office of Financial Sanctions Implementation HMT (OFSI)	
106 d	European Union Consolidated List (EU)	
106 e	Lists maintained by other G7 member countries	
106 f	Other (specify)	
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	
107 b	Transactions	
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	
109 а	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	
11. TRAININ	IG & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	
111 e	Conduct and Culture	
111 f	Fraud	
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	
112 b	1st Line of Defence	
112 c 112 d	2nd Line of Defence 3rd Line of Defence	
112 d	Third parties to which specific FCC activities have been outsourced	
112 f	Non-employed workers (contractors/consultants)	
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	
114 a	If Y, how frequently is training delivered?	
115	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches	

115 а	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. 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)?	
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		
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	Name Screening & List Management	
123 f	Reporting/Metrics & Management Information	
123 g	Suspicious Activity Filing	
123 h	Technology	
123 i	Transaction Monitoring	
123 j	Transaction Screening including for sanctions	
123 k 123 l	Training & Education Other (specify)	
1231	Outer (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. FRAU	סנ	
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.	
Dealaret	tion Statement	
Wolfsberg G	Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDD	or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of
every effort		name) is fully committed to the fight against financial crime and makes egulations and standards in all of the jurisdictions in which it does business and holds accounts.
	cial Institution understands the critical importance of having effective a egulatory obligations.	and sustainable controls to combat financial crime in order to protect its reputation and to meet its
The Financ standards.		arties to transactions in international payments and has adopted/is committed to adopting these
	cial Institution further certifies it complies with / is working to comply w ation provided in this Wolfsberg CBDDQ will be kept current and will t	with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. De updated no less frequently than every eighteen months.
The Financ	cial Institution commits to file accurate supplemental information on a	timely basis.
I, the answer Institution.		correspondent Banking or equivalent), certify that I have read and understood this declaration, that I have belief, and that I am authorised to execute this declaration on behalf of the Financial
I, Wolfsberg (ent), certify that I have read and understood this declaration, that the answers provided in this authorised to execute this declaration on behalf of the Financial Institution.
	(Signature & Date)	
	(Signature & Date)	