



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

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

No #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal Name	BANCO BILBAO VIZCAYA ARGENTARIA S.A
2	Append a list of foreign branches which are covered by this questionnaire	London, Frankfurt, Brussels, New York, Taipei, Paris, Hong Kong, Milan, Tokyo, Singapore, Portugal, Shanghai, Abu Dhabi.
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 <input checked="" type="checkbox"/>
6 a1	If Y, indicate the exchange traded on and ticker symbol	BBVA:SM Madrid, Barcelona, Bilbao, Valencia, London, Mexico, New York.
6 b	Member Owned/Mutual	No <input checked="" type="checkbox"/>
6 c	Government or State Owned by 25% or more	No <input checked="" type="checkbox"/>
6 d	Privately Owned	No <input checked="" type="checkbox"/>
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 <input type="checkbox"/>
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 <input type="checkbox"/>
10	Name of primary financial regulator/supervisory authority	BANCO DE ESPAÑA
11	Provide Legal Entity Identifier (LEI) if available	K8MS7FD7N622WQ51A271
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	None

13	Jurisdiction of licensing authority and regulator of ultimate parent	SPAIN
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes <input type="checkbox"/>
14 b	Private Banking	Yes <input type="checkbox"/>
14 c	Commercial Banking	Yes <input type="checkbox"/>
14 d	Transactional Banking	Yes <input type="checkbox"/>
14 e	Investment Banking	Yes <input type="checkbox"/>
14 f	Financial Markets Trading	Yes <input type="checkbox"/>
14 g	Securities Services/Custody	Yes <input type="checkbox"/>
14 h	Broker/Dealer	Yes <input type="checkbox"/>
14 i	Multilateral Development Bank	No <input type="checkbox"/>
14 j	Wealth Management	Yes <input type="checkbox"/>
14 k	Other (please explain)	
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	No <input type="checkbox"/>
15 a	If Y, provide the top five countries where the non-resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	10001+ <input type="checkbox"/>
16 b	Total Assets	Greater than \$500 million <input type="checkbox"/>
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	No <input type="checkbox"/>
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.	Please see annexes for all branches
2. PRODUCTS & SERVICES		
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	Yes <input type="checkbox"/>
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	Yes <input type="checkbox"/>
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	Yes <input type="checkbox"/>
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes <input type="checkbox"/>
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Yes <input type="checkbox"/>
19 a1e	Does the Entity allow downstream relationships with foreign banks?	Yes <input type="checkbox"/>
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Yes <input type="checkbox"/>
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTs)?	Yes <input type="checkbox"/>
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	No <input type="checkbox"/>
19 a1h2	MVTs	No <input type="checkbox"/>
19 a1h3	PSPs	No <input type="checkbox"/>

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs/MVTs/PSPs?	Yes	<input type="checkbox"/>
19 b	Cross-Border Bulk Cash Delivery	No	<input type="checkbox"/>
19 c	Cross-Border Remittances	Yes	<input type="checkbox"/>
19 d	Domestic Bulk Cash Delivery	No	<input type="checkbox"/>
19 e	Hold Mail	Yes	<input type="checkbox"/>
19 f	International Cash Letter	Yes	<input type="checkbox"/>
19 g	Low Price Securities	No	<input type="checkbox"/>
19 h	Payable Through Accounts	No	<input type="checkbox"/>
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	Yes	<input type="checkbox"/>
19 i1	If Y, please select all that apply below?		
19 i2	Third Party Payment Service Providers	Yes	<input type="checkbox"/>
19 i3	Virtual Asset Service Providers (VASPs)	Yes	<input type="checkbox"/>
19 i4	eCommerce Platforms	Yes	<input type="checkbox"/>
19 i5	Other - Please explain		
19 j	Private Banking	Both	<input type="checkbox"/>
19 k	Remote Deposit Capture (RDC)	No	<input type="checkbox"/>
19 l	Sponsoring Private ATMs	No	<input type="checkbox"/>
19 m	Stored Value Instruments	Yes	<input type="checkbox"/>
19 n	Trade Finance	Yes	<input type="checkbox"/>
19 o	Virtual Assets	Yes	<input type="checkbox"/>
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	<input type="checkbox"/>
19 p1a	If yes, state the applicable level of due diligence	Identification and verification	<input type="checkbox"/>
19 p2	Wire transfers	Yes	<input type="checkbox"/>
19 p2a	If yes, state the applicable level of due diligence	Identification and verification	<input type="checkbox"/>
19 p3	Foreign currency conversion	Yes	<input type="checkbox"/>
19 p3a	If yes, state the applicable level of due diligence	Identification and verification	<input type="checkbox"/>
19 p4	Sale of Monetary Instruments	Yes	<input type="checkbox"/>
19 p4a	If yes, state the applicable level of due diligence	Identification and verification	<input type="checkbox"/>
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	BBVA accepts non account customers, as it acts as receiver for Tax and Social Security/By order to SELAE We are Official LOTTERY payers and other Spanish authorities, and clients can walk in and pay their duties. BBVA has no appetite for other type of walk-in customers. In the mentioned cases, the bank duly identifies the customers according to Spanish and European best practices.	
19 q	Other high-risk products and services identified by the Entity (please specify)		
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	No	<input type="checkbox"/>
20 a	If N, clarify which questions the difference/s relate to and the branches that this applies to.	Please see annexes for all branches	
21	If appropriate, provide any additional information/context to the answers in this section.	Clarification #19o: BBVA S.A. offers the following cryptoasset services exclusively to retail customers: (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.	
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	Yes	<input type="checkbox"/>
22 b	Adverse Information Screening	Yes	<input type="checkbox"/>
22 c	Beneficial Ownership	Yes	<input type="checkbox"/>
22 d	Cash Reporting	Yes	<input type="checkbox"/>
22 e	CDD	Yes	<input type="checkbox"/>
22 f	EDD	Yes	<input type="checkbox"/>
22 g	Independent Testing	Yes	<input type="checkbox"/>
22 h	Periodic Review	Yes	<input type="checkbox"/>
22 i	Policies and Procedures	Yes	<input type="checkbox"/>
22 j	PEP Screening	Yes	<input type="checkbox"/>
22 k	Risk Assessment	Yes	<input type="checkbox"/>
22 l	Sanctions	Yes	<input type="checkbox"/>

22 m	Suspicious Activity Reporting	Yes	<input type="checkbox"/>
22 n	Training and Education	Yes	<input type="checkbox"/>
22 o	Transaction Monitoring	Yes	<input type="checkbox"/>
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	101-500	<input type="checkbox"/>
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	<input type="checkbox"/>
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes	<input type="checkbox"/>
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes	<input type="checkbox"/>
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	<input type="checkbox"/>
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	No	<input type="checkbox"/>
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. 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?	Yes	<input type="checkbox"/>
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes	<input type="checkbox"/>
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes	<input type="checkbox"/>
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes	<input type="checkbox"/>
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity	<input type="checkbox"/>
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	<input type="checkbox"/>
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes	<input type="checkbox"/>
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes	<input type="checkbox"/>
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes	<input type="checkbox"/>
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes	<input type="checkbox"/>
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes	<input type="checkbox"/>
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	<input type="checkbox"/>
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes	<input type="checkbox"/>
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes	<input type="checkbox"/>

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes	<input type="checkbox"/>
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes	<input type="checkbox"/>
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes	<input type="checkbox"/>
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes	<input type="checkbox"/>
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes	<input type="checkbox"/>
42	Does the Entity provide mandatory ABC training to:		
42 a	Board and senior Committee Management	Yes	<input type="checkbox"/>
42 b	1st Line of Defence	Yes	<input type="checkbox"/>
42 c	2nd Line of Defence	Yes	<input type="checkbox"/>
42 d	3rd Line of Defence	Yes	<input type="checkbox"/>
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Yes	<input type="checkbox"/>
42 f	Non-employed workers as appropriate (contractors/consultants)	Yes	<input type="checkbox"/>
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes	<input type="checkbox"/>
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	<input type="checkbox"/>
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
45	If appropriate, provide any additional information/context to the answers in this section.	Regarding question 42f, BBVA provides mandatory training (including the Group's ABC Policy) to interns and certain high-risk contractors, such as agents. Contractual clauses require acceptance of the Supplier Code of Ethics and compliance with applicable anti-corruption laws.	
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	Yes	<input type="checkbox"/>
46 b	Terrorist financing	Yes	<input type="checkbox"/>
46 c	Sanctions violations	Yes	<input type="checkbox"/>
47	Are the Entity's policies and procedures updated at least annually?	Yes	<input type="checkbox"/>
48	Has the Entity chosen to compare its policies and procedures against:		
48 a	U.S. Standards	Yes	<input type="checkbox"/>
48 a1	If Y, does the Entity retain a record of the results?	No	<input type="checkbox"/>
48 b	EU Standards	Yes	<input type="checkbox"/>
48 b1	If Y, does the Entity retain a record of the results?	Yes	<input type="checkbox"/>
49	Does the Entity have policies and procedures that:		
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes	<input type="checkbox"/>
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes	<input type="checkbox"/>
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes	<input type="checkbox"/>
49 d	Prohibit accounts/relationships with shell banks	Yes	<input type="checkbox"/>
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes	<input type="checkbox"/>
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes	<input type="checkbox"/>
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes	<input type="checkbox"/>
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes	<input type="checkbox"/>

49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes	<input type="checkbox"/>
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes	<input type="checkbox"/>
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes	<input type="checkbox"/>
49 l	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes	<input type="checkbox"/>
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes	<input type="checkbox"/>
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes	<input type="checkbox"/>
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes	<input type="checkbox"/>
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes	<input type="checkbox"/>
51 a	If Y, what is the retention period?	5 years or more	<input type="checkbox"/>
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	<input type="checkbox"/>
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
53	If appropriate, provide any additional information/context to the answers in this section.	Clarification #48 a): BBVA Sanctions policies comply with OFAC regulations. Other AML policies are not gapped against US standards necessarily. Clarification #49 b): BBVA SA has customers that are NBFIs.	
6. AML, CTF & SANCTIONS RISK ASSESSMENT			
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:		
54 a	Client	Yes	<input type="checkbox"/>
54 b	Product	Yes	<input type="checkbox"/>
54 c	Channel	Yes	<input type="checkbox"/>
54 d	Geography	Yes	<input type="checkbox"/>
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:		
55 a	Transaction Monitoring	Yes	<input type="checkbox"/>
55 b	Customer Due Diligence	Yes	<input type="checkbox"/>
55 c	PEP Identification	Yes	<input type="checkbox"/>
55 d	Transaction Screening	Yes	<input type="checkbox"/>
55 e	Name Screening against Adverse Media/Negative News	No	<input type="checkbox"/>
55 f	Training and Education	Yes	<input type="checkbox"/>
55 g	Governance	Yes	<input type="checkbox"/>
55 h	Management Information	Yes	<input type="checkbox"/>
56	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes	<input type="checkbox"/>
56 a	If N, provide the date when the last AML & CTF EWRA was completed.		
57	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:		
57 a	Client	Yes	<input type="checkbox"/>
57 b	Product	Yes	<input type="checkbox"/>
57 c	Channel	Yes	<input type="checkbox"/>
57 d	Geography	Yes	<input type="checkbox"/>
58	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:		
58 a	Customer Due Diligence	Yes	<input type="checkbox"/>
58 b	Governance	Yes	<input type="checkbox"/>
58 c	List Management	Yes	<input type="checkbox"/>
58 d	Management Information	Yes	<input type="checkbox"/>

58 e	Name Screening	Yes	<input type="checkbox"/>
58 f	Transaction Screening	Yes	<input type="checkbox"/>
58 g	Training and Education	Yes	<input type="checkbox"/>
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes	<input type="checkbox"/>
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	<input type="checkbox"/>
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	<input type="checkbox"/>
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	<input type="checkbox"/>
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:		
64 a	Customer Identification	Yes	<input checked="" type="checkbox"/>
64 b	Expected activity	Yes	<input checked="" type="checkbox"/>
64 c	Nature of business/employment	Yes	<input checked="" type="checkbox"/>
64 d	Ownership structure	Yes	<input checked="" type="checkbox"/>
64 e	Product usage	Yes	<input checked="" type="checkbox"/>
64 f	Purpose and nature of relationship	Yes	<input checked="" type="checkbox"/>
64 g	Source of funds	Yes	<input checked="" type="checkbox"/>
64 h	Source of wealth	Yes	<input checked="" type="checkbox"/>
65	Are each of the following identified:		
65 a	Ultimate beneficial ownership	Yes	<input checked="" type="checkbox"/>
65 a1	Are ultimate beneficial owners verified?	Yes	<input checked="" type="checkbox"/>
65 b	Authorised signatories (where applicable)	Yes	<input checked="" type="checkbox"/>
65 c	Key controllers	Yes	<input checked="" type="checkbox"/>
65 d	Other relevant parties	Yes	<input checked="" type="checkbox"/>
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	25%	<input type="checkbox"/>
67	Does the due diligence process result in customers receiving a risk classification?	Yes	<input type="checkbox"/>
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	<input checked="" type="checkbox"/>
67 a2	Geography	Yes	<input checked="" type="checkbox"/>
67 a3	Business Type/Industry	Yes	<input checked="" type="checkbox"/>
67 a4	Legal Entity type	Yes	<input checked="" type="checkbox"/>
67 a5	Adverse Information	Yes	<input checked="" type="checkbox"/>
67 a6	Other (specify)	Length of the relationship and AML screenings.	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes	<input type="checkbox"/>
68 a	If Y, is this at:		
68 a1	Onboarding	Yes	<input checked="" type="checkbox"/>
68 a2	KYC renewal	Yes	<input checked="" type="checkbox"/>
68 a3	Trigger event	Yes	<input checked="" type="checkbox"/>
68 a4	Other	Yes	<input checked="" type="checkbox"/>
68 a4a	If yes, please specify "Other"	Irregular operations	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes	<input type="checkbox"/>
69 a	If Y, is this at:		
69 a1	Onboarding	Yes	<input checked="" type="checkbox"/>
69 a2	KYC renewal	Yes	<input checked="" type="checkbox"/>

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

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

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 <input type="checkbox"/>
93 b	Local Regulations	Yes <input checked="" type="checkbox"/>
93 b1	If Y, specify the regulation	EU Regulation 847/2015
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes <input type="checkbox"/>
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes <input type="checkbox"/>
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes <input type="checkbox"/>
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes <input type="checkbox"/>
96 a	If N, clarify which questions the difference/s relate to and the branches that this applies to.	See annexes for branches
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANCTIONS		
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes <input type="checkbox"/>
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 <input type="checkbox"/>
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 <input type="checkbox"/>
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes <input type="checkbox"/>
102	What is the method used by the Entity for sanctions screening?	Both Automated and Manual <input type="checkbox"/>
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Both <input type="checkbox"/>
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	FIRCOFT
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 <input type="checkbox"/>
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes <input type="checkbox"/>
104	What is the method used by the Entity?	Automated <input type="checkbox"/>

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes	<input type="checkbox"/>
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	<input type="checkbox"/>
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	<input type="checkbox"/>
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners (i.e. reference data)	<input type="checkbox"/>
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data	<input type="checkbox"/>
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners (i.e. reference data)	<input type="checkbox"/>
106 f	Other (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	<input type="checkbox"/>
107 b	Transactions	Same day to 2 business days	<input type="checkbox"/>
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	<input type="checkbox"/>
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	No	<input type="checkbox"/>
109 a	If 'N', clarify which questions the difference/s relate to and the branches that this applies to.	Please, see annexes for branches.	
110	If appropriate, provide any additional information/context to the answers in this section.	#99 We have procedures to avoid prohibitions within jurisdictions where we have presence and from EU, UN, and OFAC , but cannot prevent local prohibitions in the rest of jurisdictions where our correspondent banks are established.	
11. TRAINING & EDUCATION			
111	Does the Entity provide mandatory training, which includes:		
111 a	Identification and reporting of transactions to government authorities	Yes	<input type="checkbox"/>
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes	<input type="checkbox"/>
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes	<input type="checkbox"/>
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes	<input type="checkbox"/>
111 e	Conduct and Culture	Yes	<input type="checkbox"/>
111 f	Fraud	Yes	<input type="checkbox"/>
112	Is the above mandatory training provided to:		
112 a	Board and Senior Committee Management	Yes	<input type="checkbox"/>
112 b	1st Line of Defence	Yes	<input type="checkbox"/>
112 c	2nd Line of Defence	Yes	<input type="checkbox"/>
112 d	3rd Line of Defence	Yes	<input type="checkbox"/>
112 e	Third parties to which specific FCC activities have been outsourced	Yes	<input type="checkbox"/>
112 f	Non-employed workers (contractors/consultants)	Yes	<input type="checkbox"/>
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Yes	<input type="checkbox"/>
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes	<input type="checkbox"/>
114 a	If 'Y', how frequently is training delivered?	Annually	<input type="checkbox"/>
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	<input type="checkbox"/>

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

129	Does the Entity have real time monitoring to detect fraud?	Yes	<input checked="" type="checkbox"/>
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	<input checked="" type="checkbox"/>
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes	<input checked="" type="checkbox"/>
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Does not apply.	
132	If appropriate, provide any additional information/context to the answers in this section.	*Does not apply.	

Declaration Statement

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

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

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

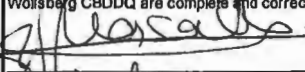
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

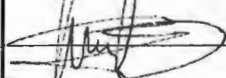
The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen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

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

I, 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.

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

 MAY/04/2026
 (Signature & Date)

 APR/30/26
 (Signature & Date)



Financial Institution Name:
Location (Country):

Banco Bilbao Vizcaya Argentaria, S.A ADGM Branch
United Arab Emirates

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the

No #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal Name	Banco Bilbao Vizcaya Argentaria S.A.
2	Append a list of foreign branches which are covered by this questionnaire	Abu Dhabi, United Arab Emirates
3	Full Legal (Registered) Address	Al Sila Tower, Level 12, Unit 7 ADGM, Al Maryah Island, Abu Dhabi U
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	23 January 2026
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Please select
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	Please select
6 c	Government or State Owned by 25% or more	Please select
6 d	Privately Owned	Please select
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	Please select
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	Please select
10	Name of primary financial regulator/supervisory authority	
11	Provide Legal Entity Identifier (LEI) if available	
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	

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

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/PSPs?	Please select
19 b	Cross-Border Bulk Cash Delivery	Please select
19 c	Cross-Border Remittances	No
19 d	Domestic Bulk Cash Delivery	Please select
19 e	Hold Mail	No
19 f	International Cash Letter	No
19 g	Low Price Securities	Please select
19 h	Payable Through Accounts	Please select
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	No
19 i1	If Y , please select all that apply below?	
19 i2	Third Party Payment Service Providers	Please select
19 i3	Virtual Asset Service Providers (VASPs)	Please select
19 i4	eCommerce Platforms	Please select
19 i5	Other - Please explain	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	Please select
19 l	Sponsoring Private ATMs	Please select
19 m	Stored Value Instruments	No
19 n	Trade Finance	No
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.	
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	No
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Banco Bilbao Vizcaya Argentaria, S.A ADGM Branch
21	If appropriate, provide any additional information/context to the answers in this section.	
3. AML, CTF & SANCTIONS PROGRAMME		
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	Please select
22 b	Adverse Information Screening	Please select
22 c	Beneficial Ownership	Please select
22 d	Cash Reporting	Please select
22 e	CDD	Please select
22 f	EDD	Please select
22 g	Independent Testing	Please select
22 h	Periodic Review	Please select
22 i	Policies and Procedures	Please select
22 j	PEP Screening	Please select
22 k	Risk Assessment	Please select
22 l	Sanctions	Please select

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

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly 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		
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Please select
46 b	Terrorist financing	Please select
46 c	Sanctions violations	Please select
47	Are the Entity's policies and procedures updated at least annually?	Please select
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	Please select
48 a1	If Y, does the Entity retain a record of the results?	Please select
48 b	EU Standards	Please select
48 b1	If Y, does the Entity retain a record of the results?	Please select
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Please select
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Please select
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Please select
49 d	Prohibit accounts/relationships with shell banks	Please select
49 e	Prohibit dealing with another entity that provides services to shell banks	Please select
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Please select
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Please select
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Please select

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

58 e	Name Screening	Please select
58 f	Transaction Screening	Please select
58 g	Training and Education	Please select
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Please select
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context to the answers in this section.	
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	Please select
74 a2	1 – 2 years	Please select
74 a3	3 – 4 years	Please select
74 a4	5 years or more	Please select
74 a5	Trigger-based or perpetual monitoring reviews	Please select
74 a6	Other (Please specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Please select
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Please select
76 b	Respondent Banks	Please select
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Please select
76 c	Embassies/Consulates	Please select
76 d	Extractive industries	Please select
76 e	Gambling customers	Please select
76 f	General Trading Companies	Please select
76 g	Marijuana-related Entities	Please select
76 h	MSB/MVTS customers	Please select
76 i	Non-account customers	Please select
76 j	Non-Government Organisations	Please select
76 k	Non-resident customers	Please select
76 l	Nuclear power	Please select
76 m	Payment Service Providers	Please select
76 n	PEPs	Please select
76 o	PEP Close Associates	Please select
76 p	PEP Related	Please select
76 q	Precious metals and stones	Please select
76 r	Red light businesses/Adult entertainment	Please select
76 s	Regulated charities	Please select
76 t	Shell banks	Please select
76 u	Travel and Tour Companies	Please select
76 v	Unregulated charities	Please select
76 w	Used Car Dealers	Please select
76 x	Virtual Asset Service Providers	Please select
76 y	Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/or compliance approval?	Please select

78 a	If Y indicate who provides the approval:	Please select
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Please select
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Please select
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	Banco Bilbao Vizcaya Argentaria, S.A ADGM Branch
82	If appropriate, provide any additional information/context to the answers in this section.	Local procedure applicable as required
8. MONITORING & 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. PAYMENT TRANSPARENCY		
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Please select

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Please select
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	FSRA and UAE Central Bank
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. SANCTIONS		
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)	UAE local sanctions list (EOCN)
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.	Banco Bilbao Vizcaya Argentaria, S.A ADGM Branch
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	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. QUALITY ASSURANCE /COMPLIANCE TESTING		
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)?	Please select
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Please select
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
13. AUDIT		
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other Independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Please select
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Please select
122 b	External Third Party	Please select
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Please select
123 b	Enterprise Wide Risk Assessment	Please select
123 c	Governance	Please select
123 d	KYC/CDD/EDD and underlying methodologies	Please select
123 e	Name Screening & List Management	Please select
123 f	Reporting/Metrics & Management Information	Please select
123 g	Suspicious Activity Filing	Please select
123 h	Technology	Please select
123 i	Transaction Monitoring	Please select
123 j	Transaction Screening including for sanctions	Please select
123 k	Training & Education	Please select
123 l	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Please select
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Please select
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
14. FRAUD		
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 branches 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. ADGM Branch 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/committed to adopting these standards.

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

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

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

I, Nico van Bockstal, ADGM Compliance Officer and MLRO 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)

28/05/2026 (Signature & Date)



Financial Institution Name: Banco Bilbao Vizcaya Argentaria S.A., Niederlassung Deutschland
 Location (Country): Germany

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

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

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13	Jurisdiction of licensing authority and regulator of 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	Please select
14 d	Transactional Banking	Please select
14 e	Investment Banking	Please select
14 f	Financial Markets Trading	Please select
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	Please select
14 j	Wealth Management	No
14 k	Other (please explain)	
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	Please select
15 a	If Y, provide the top five countries where the non-resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	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. PRODUCTS & 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
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Please select
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Please select
19 a1e	Does the Entity allow downstream relationships with foreign banks?	Please select
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Please select
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSS)?	Please select
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSS, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	Please select
19 a1h2	MVTSS	Please select
19 a1h3	PSPs	Please select

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19 a11	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/PSPs?	Please select
19 b	Cross-Border Bulk Cash Delivery	Please select
19 c	Cross-Border Remittances	No
19 d	Domestic Bulk Cash Delivery	Please select
19 e	Hold Mail	No
19 f	International Cash Letter	No
19 g	Low Price Securities	Please select
19 h	Payable Through Accounts	Please select
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	No
19 i1	If Y , please select all that apply below?	
19 i2	Third Party Payment Service Providers	Please select
19 i3	Virtual Asset Service Providers (VASPs)	Please select
19 i4	eCommerce Platforms	Please select
19 i5	Other - Please explain	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	Please select
19 l	Sponsoring Private ATMs	Please select
19 m	Stored Value Instruments	No
19 n	Trade Finance	Please select
19 o	Virtual Assets	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.	
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	No
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Banco Bilbao Vizcaya Argentaria S.A., Niederlassung Deutschland
21	If appropriate, provide any additional information/context to the answers in this section.	
3. AML, CTF & SANCTIONS PROGRAMME		
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	Please select
22 b	Adverse Information Screening	Please select
22 c	Beneficial Ownership	Please select
22 d	Cash Reporting	Please select
22 e	CDD	Please select
22 f	EDD	Please select
22 g	Independent Testing	Please select
22 h	Periodic Review	Please select
22 i	Policies and Procedures	Please select
22 j	PEP Screening	Please select
22 k	Risk Assessment	Please select
22 l	Sanctions	Please select

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

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40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Please select
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Please select
40 d	Corruption risks associated with gifts and hospitality, hiring/Internships, charitable donations and political contributions	Please select
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Please select
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Please select
42	Does the Entity provide mandatory ABC training to:	
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		
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Please select
46 b	Terrorist financing	Please select
46 c	Sanctions violations	Please select
47	Are the Entity's policies and procedures updated at least annually?	Please select
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	Please select
48 a1	If Y, does the Entity retain a record of the results?	Please select
48 b	EU Standards	Please select
48 b1	If Y, does the Entity retain a record of the results?	Please select
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Please select
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Please select
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Please select
49 d	Prohibit accounts/relationships with shell banks	Please select
49 e	Prohibit dealing with another entity that provides services to shell banks	Please select
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Please select
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Please select
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Please select

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

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58 e	Name Screening	Please select
58 f	Transaction Screening	Please select
58 g	Training and Education	Please select
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Please select
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context to the answers in this section.	
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	Yes
65 d	Other relevant parties	Please select
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	Please select
67	Does the due diligence process result in customers receiving a risk classification?	Please select
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Please select
67 a2	Geography	Please select
67 a3	Business Type/Industry	Please select
67 a4	Legal Entity type	Please select
67 a5	Adverse Information	Please select
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Please select
68 a	If Y, is this at:	
68 a1	Onboarding	Please select
68 a2	KYC renewal	Please select
68 a3	Trigger event	Please select
68 a4	Other	Please select
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Please select
69 a	If Y, is this at:	
69 a1	Onboarding	Please select
69 a2	KYC renewal	Please select

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

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78 a	If Y indicate who provides the approval:	Please select
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Please select
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Please select
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	Banco Bilbao Vizcaya Argentaria S.A., Niederlassung Deutschland
82	If appropriate, provide any additional information/context to the answers in this section.	Local procedure applicable as required
8. MONITORING & 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. PAYMENT TRANSPARENCY		
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Please select

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93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Please select
93 b	Local Regulations	Please select
93 b1	If Y, specify the regulation	
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. SANCTIONS		
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

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105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Please select
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Please select
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Please select
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Please select
106 d	European Union Consolidated List (EU)	Please select
106 e	Lists maintained by other G7 member countries	Please select
106 f	Other (specify)	
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Please select
107 b	Transactions	Please select
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Banco Bilbao Vizcaya Argentaria S.A., Niederlassung Deutschland
110	If appropriate, provide any additional information/context to the answers in this section.	
11. TRAINING & 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

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115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	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. QUALITY ASSURANCE /COMPLIANCE TESTING		
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)?	Please select
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Please select
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	In addition to the Group programme, the Compliance function at Banco Bilbao Vizcaya Argentaria 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	Governance	Please select
123 d	KYC/CDD/EDD and underlying methodologies	Please select
123 e	Name Screening & List Management	Please select
123 f	Reporting/Metrics & Management Information	Please select
123 g	Suspicious Activity Filing	Please select
123 h	Technology	Please select
123 i	Transaction Monitoring	Please select
123 j	Transaction Screening including for sanctions	Please select
123 k	Training & Education	Please select
123 l	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Please select
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Please select
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
14. FRAUD		
127	Does the Entity have policies in place addressing fraud risk?	Please select
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Please select

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

Declaration Statement

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

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

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

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

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

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

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

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

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

BBVA (Signature & Date)
Banco Bilbao Vizcaya Argentaria, S.A.
Niederlassung Da (Signature & Date)
 Neue Mainzer Str. 28
 60311 Frankfurt



Financial Institution Name: Banco Bilbao Vizcaya Argentaria S.A. (Belgian Branch)
 Location (Country): Belgium

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

No #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal Name	Banco Bilbao Vizcaya Argentaria S.A.
2	Append a list of foreign branches which are covered by this questionnaire	BBVA Belgian Branch
3	Full Legal (Registered) Address	Carstersteen 47, B-1000 Brussels
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	Branch established in 1962
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Please select
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	Please select
6 c	Government or State Owned by 25% or more	Please select
6 d	Privately Owned	Please select
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	Please select
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	Please select
10	Name of primary financial regulator/supervisory authority	Banque Nationale de Belgique (BNB) / Autorité des Services et Marchés Financiers (FSMA)
11	Provide Legal Entity Identifier (LEI) if available	
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	

13	Jurisdiction of licensing authority and regulator of ultimate parent	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	No
14 b	Private Banking	No
14 c	Commercial Banking	Please select
14 d	Transactional Banking	Please select
14 e	Investment Banking	No
14 f	Financial Markets Trading	No
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	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 \$100 and \$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. PRODUCTS & 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
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Please select
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Please select
19 a1e	Does the Entity allow downstream relationships with foreign banks?	Please select
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Please select
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTs)?	Please select
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	Please select
19 a1h2	MVTs	Please select
19 a1h3	PSPs	Please select

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/PSPs?	Please select
19 b	Cross-Border Bulk Cash Delivery	Please select
19 c	Cross-Border Remittances	Please select
19 d	Domestic Bulk Cash Delivery	Please select
19 e	Hold Mail	No
19 f	International Cash Letter	Please select
19 g	Low Price Securities	Please select
19 h	Payable Through Accounts	Please select
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	No
19 i1	If Y , please select all that apply below?	
19 i2	Third Party Payment Service Providers	Please select
19 i3	Virtual Asset Service Providers (VASPs)	Please select
19 i4	eCommerce Platforms	Please select
19 i5	Other - Please explain	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	Please select
19 l	Sponsoring Private ATMs	Please select
19 m	Stored Value Instruments	No
19 n	Trade Finance	Please select
19 o	Virtual Assets	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	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. AML, CTF & SANCTIONS PROGRAMME		
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	Please select
22 b	Adverse Information Screening	Please select
22 c	Beneficial Ownership	Please select
22 d	Cash Reporting	Please select
22 e	CDD	Please select
22 f	EDD	Please select
22 g	Independent Testing	Please select
22 h	Periodic Review	Please select
22 i	Policies and Procedures	Please select
22 j	PEP Screening	Please select
22 k	Risk Assessment	Please select
22 l	Sanctions	Please select

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

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly 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		
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Please select
46 b	Terrorist financing	Please select
46 c	Sanctions violations	Please select
47	Are the Entity's policies and procedures updated at least annually?	Please select
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	Please select
48 a1	If Y, does the Entity retain a record of the results?	Please select
48 b	EU Standards	Please select
48 b1	If Y, does the Entity retain a record of the results?	Please select
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Please select
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Please select
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Please select
49 d	Prohibit accounts/relationships with shell banks	Please select
49 e	Prohibit dealing with another entity that provides services to shell banks	Please select
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Please select
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Please select
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Please select

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

58 e	Name Screening	Please select
58 f	Transaction Screening	Please select
58 g	Training and Education	Please select
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Please select
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context to the answers in this section.	
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	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	Do not have this category of customer or industry
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Please select
76 c	Embassies/Consulates	Do not have this category of customer or industry
76 d	Extractive industries	Please select
76 e	Gambling customers	Do not have this category of customer or industry
76 f	General Trading Companies	Do not have this category of customer or industry
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	Please select
76 k	Non-resident customers	Please select
76 l	Nuclear power	Do not have this category of customer or industry
76 m	Payment Service Providers	Do not have this category of customer or industry
76 n	PEPs	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	Do not have this category of customer or industry
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	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?	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.	BBVA Belgian Branch identify beneficial owners according to the requirements of Belgian legislation.
8. MONITORING & 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. Soon to be replaced by FUSION and MICROSTRATEGY
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 from the parent company
9. PAYMENT TRANSPARENCY		
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Please select

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Please select
93 b	Local Regulations	Please select
93 b1	If Y, specify the regulation	
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. SANCTIONS		
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. TRAINING & 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. QUALITY ASSURANCE /COMPLIANCE TESTING		
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)?	Please select
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Please select
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
13. AUDIT		
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Please select
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Please select
122 b	External Third Party	Please select
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Please select
123 b	Enterprise Wide Risk Assessment	Please select
123 c	Governance	Please select
123 d	KYC/CDD/EDD and underlying methodologies	Please select
123 e	Name Screening & List Management	Please select
123 f	Reporting/Metrics & Management Information	Please select
123 g	Suspicious Activity Filing	Please select
123 h	Technology	Please select
123 i	Transaction Monitoring	Please select
123 j	Transaction Screening including for sanctions	Please select
123 k	Training & Education	Please select
123 l	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Please select
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Please select
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
14. FRAUD		
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 branches 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. (Belgian Branch) (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

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

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

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

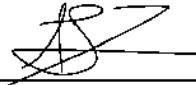
The Financial Institution commits to file accurate supplemental information on a timely basis.

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

I, Agustín Sánchez Pablo (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)

08/05/2026



(Signature & Date)



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

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

No	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal Name	BANCO BILBAO VIZCAYA ARGENTARIA SA French Branch
2	Append a list of foreign branches which are covered by this questionnaire	FRANCE
3	Full Legal (Registered) Address	25 / 27 Rue d'Astorg 75017 Paris
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	1902
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Please select
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	Please select
6 c	Government or State Owned by 25% or more	Please select
6 d	Privately Owned	Please select
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	Please select
8 a	If Y, provide the name of the relevant branches 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	894500247KEMAOHHP28
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	

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13	Jurisdiction of licensing authority and regulator of ultimate parent	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	No
14 b	Private Banking	Please select
14 c	Commercial Banking	No
14 d	Transactional Banking	Please select
14 e	Investment Banking	Please select
14 f	Financial Markets Trading	Please select
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	Please select
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	Please select
15 a	If Y, provide the top five countries where the non-resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	51-200
16 b	Total Assets	Please select
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Please select
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	
Section 19		
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	No
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	Please select
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	Please select
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Please select
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Please select
19 a1e	Does the Entity allow downstream relationships with foreign banks?	Please select
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Please select
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTs)?	Please select
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	Please select
19 a1h2	MVTs	Please select
19 a1h3	PSPs	Please select

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

19 a1	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/PSPs?	No
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Please select
19 d	Domestic Bulk Cash Delivery	Please select
19 e	Hold Mail	No
19 f	International Cash Letter	Please select
19 g	Low Price Securities	No
19 h	Payable Through Accounts	Please select
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	No
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	Please select
19 i3	Virtual Asset Service Providers (VASPs)	Please select
19 i4	eCommerce Platforms	Please select
19 i5	Other - Please explain	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	Please select
19 l	Sponsoring Private ATMs	Please select
19 m	Stored Value Instruments	No
19 n	Trade Finance	Please select
19 o	Virtual Assets	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
19 p2	Wire transfers	Please select
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p3	Foreign currency conversion	Please select
19 p3a	If yes, state the applicable level of due diligence	Please select
19 p4	Sale of Monetary Instruments	Please select
19 p4a	If yes, state the applicable level of due diligence	Please select
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	N/A
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Please select
20 a	If N, clarify which questions the difference/s relate to and the branches that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	
22 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	Please select
22 b	Adverse Information Screening	Please select
22 c	Beneficial Ownership	Please select
22 d	Cash Reporting	Please select
22 e	CDD	Please select
22 f	EDD	Please select
22 g	Independent Testing	Please select
22 h	Periodic Review	Please select
22 i	Policies and Procedures	Please select
22 j	PEP Screening	Please select
22 k	Risk Assessment	Please select
22 l	Sanctions	Please select

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

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 branches that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	
4. ANTI-BRIBERY & CORRUPTION		
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Please select
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Please select
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Please select
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Please select
34	Is the Entity's ABC programme applicable to:	Please select
35	Does the Entity have a global ABC policy that	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Please select
35 b	Includes enhanced requirements regarding interaction with public officials?	Please select
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Please select
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Please select
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Please select
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Please select
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Please select
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Please select
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Please select

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

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

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58 e	Name Screening	Please select
58 f	Transaction Screening	Please select
58 g	Training and Education	Please select
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Please select
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context to the answers in this section.	
7. Risk Classification		
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	Authorized 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?	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?	Please select
69 a	If Y, is this at:	
69 a1	Onboarding	Please select
69 a2	KYC renewal	Please select

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

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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 the French Regulation
8. PAYMENT TRANSPARENCY		
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?	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.	Tools are maintained and updated by, from the Parent Company
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Please select

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93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Please select
93 b	Local Regulations	Please select
93 b1	If Y, specify the regulation	
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. SANCTIONS		
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

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105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Please select
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Please select
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Please select
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Please select
106 d	European Union Consolidated List (EU)	Please select
106 e	Lists maintained by other G7 member countries	Please select
106 f	Other (specify)	
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Please select
107 b	Transactions	Please select
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	Please select
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
109 a	If N, clarify which questions the difference/s relate to and the branches that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	
11. TRAINING & 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.	
117		
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.	
121		
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Please select
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Please select
122 b	External Third Party	Please select
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Please select
123 b	Enterprise Wide Risk Assessment	Please select
123 c	Governance	Please select
123 d	KYC/CDD/EDD and underlying methodologies	Please select
123 e	Name Screening & List Management	Please select
123 f	Reporting/Metrics & Management Information	Please select
123 g	Suspicious Activity Filing	Please select
123 h	Technology	Please select
123 i	Transaction Monitoring	Please select
123 j	Transaction Screening including for sanctions	Please select
123 k	Training & Education	Please select
123 l	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Please select
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Please select
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
14. FRAUD		
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 (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/s committed to adopting these standards.

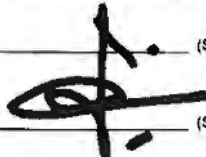
The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen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

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

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

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

05/05/2026 _____ (Signature & Date)



_____ (Signature & Date)



Financial Institution Name: **BANCO BILBAO VIZCAYA ARGENTARIA S.A.**
 Location (Country): **Hong Kong**

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

No #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal Name	
2	Append a list of foreign branches which are covered by this questionnaire	Hong Kong
3	Full Legal (Registered) Address	Unit 9507, Level 95, International Commerce Centre, One Austin Road West, Kowloon, Hong Kong
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	The Hong Kong Branch (under the former name of Banco Exterior de Espana, S.A.) was established in 1985. After several mergers with some Spanish banks thereafter, the name has been changed to Banco Bilbao Vizcaya Argentaria, S.A. in 2000.
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Please select
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	Please select
6 c	Government or State Owned by 25% or more	Please select
6 d	Privately Owned	Please select
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	Please select
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	Please select
10	Name of primary financial regulator/supervisory authority	Hong Kong Monetary Authority
11	Provide Legal Entity Identifier (LEI) if available	
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	

13	Jurisdiction of licensing authority and regulator of ultimate parent	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	No <input type="checkbox"/>
14 b	Private Banking	No <input type="checkbox"/>
14 c	Commercial Banking	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 j	Wealth Management	No <input type="checkbox"/>
14 k	Other (please explain)	
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	Yes <input type="checkbox"/>
15 a	If Y, provide the top five countries where the non-resident customers are located.	Australia, Taiwan, U.S.A, Netherlands, United Kingdom
16	Select the closest value:	
16 a	Number of employees	51-200 <input type="checkbox"/>
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 branches that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	
2. PRODUCTS & SERVICES		
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	Please select
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	No <input type="checkbox"/>
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	No <input type="checkbox"/>
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	No <input type="checkbox"/>
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Please select
19 a1e	Does the Entity allow downstream relationships with foreign banks?	Please select
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Please select
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSS)?	No <input type="checkbox"/>
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSS, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	Please select
19 a1h2	MVTSS	Please select
19 a1h3	PSPs	Please select


19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/PSPs?	Please select
19 b	Cross-Border Bulk Cash Delivery	Please select
19 c	Cross-Border Remittances	Please select
19 d	Domestic Bulk Cash Delivery	Please select
19 e	Hold Mail	No <input type="checkbox"/>
19 f	International Cash Letter	Please select
19 g	Low Price Securities	Please select
19 h	Payable Through Accounts	Please select
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	No <input type="checkbox"/>
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	No <input type="checkbox"/>
19 i3	Virtual Asset Service Providers (VASPs)	No <input type="checkbox"/>
19 i4	eCommerce Platforms	No <input type="checkbox"/>
19 i5	Other - Please explain	
19 j	Private Banking	No <input type="checkbox"/>
19 k	Remote Deposit Capture (RDC)	Please select
19 l	Sponsoring Private ATMs	Please select
19 m	Stored Value Instruments	No <input type="checkbox"/>
19 n	Trade Finance	Please select
19 o	Virtual Assets	No <input type="checkbox"/>
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	No <input type="checkbox"/>
19 p1a	If yes, state the applicable level of due diligence	Please select
19 p2	Wire transfers	No <input type="checkbox"/>
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p3	Foreign currency conversion	No <input type="checkbox"/>
19 p3a	If yes, state the applicable level of due diligence	Please select
19 p4	Sale of Monetary Instruments	No <input type="checkbox"/>
19 p4a	If yes, state the applicable level of due diligence	Please select
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	Not applicable
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Please select
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	Q19a1d- 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, CTF & SANCTIONS PROGRAMME		
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	Please select
22 b	Adverse Information Screening	Please select
22 c	Beneficial Ownership	Please select
22 d	Cash Reporting	Please select
22 e	CDD	Please select
22 f	EDD	Please select
22 g	Independent Testing	Please select
22 h	Periodic Review	Please select
22 i	Policies and Procedures	Please select
22 j	PEP Screening	Please select
22 k	Risk Assessment	Please select
22 l	Sanctions	Please select

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

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly 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		
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Please select
46 b	Terrorist financing	Please select
46 c	Sanctions violations	Please select
47	Are the Entity's policies and procedures updated at least annually?	Please select
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	Please select
48 a1	If Y, does the Entity retain a record of the results?	Please select
48 b	EU Standards	Please select
48 b1	If Y, does the Entity retain a record of the results?	Please select
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Please select
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Please select
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Please select
49 d	Prohibit accounts/relationships with shell banks	Please select
49 e	Prohibit dealing with another entity that provides services to shell banks	Please select
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Please select
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Please select
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Please select

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

58 e	Name Screening	Please select
58 f	Transaction Screening	Please select
58 g	Training and Education	Please select
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Please select
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context to the answers in this section.	
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?	No <input type="checkbox"/>
68 a	If Y, is this at:	
68 a1	Onboarding	Please select
68 a2	KYC renewal	Please select
68 a3	Trigger event	Please select
68 a4	Other	Please select
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Please select
69 a	If Y, is this at:	
69 a1	Onboarding	Please select
69 a2	KYC renewal	Please select

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

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Please select
93 b	Local Regulations	Please select
93 b1	If Y, specify the regulation	Anti-Money Laundering and Counter-Terrorist Financing Ordinance, Cap. 615
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. SANCTIONS		
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 or 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. TRAINING & 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. QUALITY ASSURANCE /COMPLIANCE TESTING		
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)?	Please select
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Please select
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
13. AUDIT		
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Please select
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Please select
122 b	External Third Party	Please select
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Please select
123 b	Enterprise Wide Risk Assessment	Please select
123 c	Governance	Please select
123 d	KYC/CDD/EDD and underlying methodologies	Please select
123 e	Name Screening & List Management	Please select
123 f	Reporting/Metrics & Management Information	Please select
123 g	Suspicious Activity Filing	Please select
123 h	Technology	Please select
123 i	Transaction Monitoring	Please select
123 j	Transaction Screening including for sanctions	Please select
123 k	Training & Education	Please select
123 l	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Please select
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Please select
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
14. FRAUD		
127	Does the Entity have policies in place addressing fraud risk?	Please select
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Please select

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

Declaration Statement

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

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

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

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

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

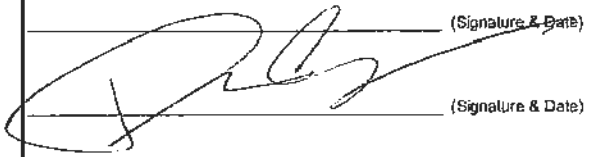
The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen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

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

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

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

(Signature & Date)



(Signature & Date)



Financial Institution Name: **BANCO BILBAO VIZCAYA AGENTARIA S.A., Tokyo Branch**
 Location (Country) : **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
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	
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Please select
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	Please select
6 c	Government or State Owned by 25% or more	Please select
6 d	Privately Owned	Please select
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	Please select
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	Please select
10	Name of primary financial regulator/supervisory authority	Financial Services Agency
11	Provide Legal Entity Identifier (LEI) if available	
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	

13	Jurisdiction of licensing authority and regulator of ultimate parent	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	No
14 b	Private Banking	No
14 c	Commercial Banking	Please select
14 d	Transactional Banking	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)	
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 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. PRODUCTS & 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
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Please select
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Please select
19 a1e	Does the Entity allow downstream relationships with foreign banks?	Please select
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Please select
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSS)?	Please select
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSS, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	Please select
19 a1h2	MVTSS	Please select
19 a1h3	PSPs	Please select

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/PSPs?	No
19 b	Cross-Border Bulk Cash Delivery	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 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
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.	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
22 d	Cash Reporting	Please select
22 e	CDD	Please select
22 f	EDD	Please select
22 g	Independent Testing	Please select
22 h	Periodic Review	Please select
22 i	Policies and Procedures	Please select
22 j	PEP Screening	Please select
22 k	Risk Assessment	Please select
22 l	Sanctions	Please select

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

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly 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		
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Please select
46 b	Terrorist financing	Please select
46 c	Sanctions violations	Please select
47	Are the Entity's policies and procedures updated at least annually?	Please select
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	Please select
48 a1	If Y, does the Entity retain a record of the results?	Please select
48 b	EU Standards	Please select
48 b1	If Y, does the Entity retain a record of the results?	Please select
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Please select
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Please select
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Please select
49 d	Prohibit accounts/relationships with shell banks	Please select
49 e	Prohibit dealing with another entity that provides services to shell banks	Please select
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Please select
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Please select
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Please select

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

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58 e	Name Screening	Please select
58 f	Transaction Screening	Please select
58 g	Training and Education	Please select
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Please select
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context to the answers in this section.	
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

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69 a3	Trigger event	Please select
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Please select
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Please select
71 a	If Y, is this at:	
71 a1	Onboarding	Please select
71 a2	KYC renewal	Please select
71 a3	Trigger event	Please select
72	What is the method used by the Entity to screen PEPs?	Please select
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Please select
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Please select
74 a	If yes, select all that apply:	
74 a1	Less than one year	Please select
74 a2	1 – 2 years	Please select
74 a3	3 – 4 years	Please select
74 a4	5 years or more	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
76 e	Gambling customers	Please select
76 f	General Trading Companies	Please select
76 g	Marijuana-related Entities	Please select
76 h	MSB/MVTS customers	Please select
76 i	Non-account customers	Please select
76 j	Non-Government Organisations	Please select
76 k	Non-resident customers	Please select
76 l	Nuclear power	Please select
76 m	Payment Service Providers	Please select
76 n	PEPs	Please select
76 o	PEP Close Associates	Please select
76 p	PEP Related	Please select
76 q	Precious metals and stones	Please select
76 r	Red light businesses/Adult entertainment	Please select
76 s	Regulated charities	Please select
76 t	Shell banks	Please select
76 u	Travel and Tour Companies	Please select
76 v	Unregulated charities	Please select
76 w	Used Car Dealers	Please select
76 x	Virtual Asset Service Providers	Please select
76 y	Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/or compliance approval?	Please select

78 a	If Y indicate who provides the approval:	Please select
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Please select
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Please select
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
82	If appropriate, provide any additional information/context to the answers in this section.	
8. MONITORING & 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	As Tokyo Branch does not provide 3rd party payment services in customers and the number of transaction is quite limited, 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.	
9. PAYMENT TRANSPARENCY		
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Please select

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Please select
93 b	Local Regulations	Please select
93 b1	If Y, specify the regulation	
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. SANCTIONS		
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. TRAINING & 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 branches that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
12. QUALITY ASSURANCE /COMPLIANCE TESTING		
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the Independent Audit function)?	Please select
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Please select
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
119 a	If N, clarify which questions the difference/s relate to and the branches 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	Suspicious Activity Filing	Please select
123 h	Technology	Please select
123 i	Transaction Monitoring	Please select
123 j	Transaction Screening including for sanctions	Please select
123 k	Training & Education	Please select
123 l	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Please select
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Please select
125 a	If N, clarify which questions the difference/s relate to and the branches that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
14. FRAUD		
127	Does the Entity have policies in place addressing fraud risk?	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?	No
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, Tokyo Branch _____ (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

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

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


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

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

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

I, Akihiro Kato _____ (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)

 11 May, 2026

 (Signature & Date)



Financial Institution Name: Banco Bilbao Vizcaya Argentaria S.A., London Branch
 Location (Country) : 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
1. ENTITY & OWNERSHIP		
1	Full Legal Name	Banco Bilbao Vizcaya Argentaria S.A.
2	Append a list of foreign branches which are covered by this questionnaire	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	
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	54930001TT4HB63XLV65
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	

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13	Jurisdiction of licensing authority and regulator of ultimate parent	Spain
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Please select
14 b	Private Banking	No <input type="checkbox"/>
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 j	Wealth Management	No <input type="checkbox"/>
14 k	Other (please explain)	
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	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	201-500 <input type="checkbox"/>
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. PRODUCTS & SERVICES		
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	No <input type="checkbox"/>
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	Please select
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	Please select
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Please select
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Please select
19 a1e	Does the Entity allow downstream relationships with foreign banks?	Please select
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Please select
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTs)?	Please select
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	Please select
19 a1h2	MVTs	Please select
19 a1h3	PSPs	Please select

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19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/PSPs?	Please select
19 b	Cross-Border Bulk Cash Delivery	Please select
19 c	Cross-Border Remittances	Please select
19 d	Domestic Bulk Cash Delivery	Please select
19 e	Hold Mail	Please select
19 f	International Cash Letter	Please select
19 g	Low Price Securities	Please select
19 h	Payable Through Accounts	Please select
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	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 i5	Other - Please explain	
19 j	Private Banking	No <input type="checkbox"/>
19 k	Remote Deposit Capture (RDC)	Please select
19 l	Sponsoring Private ATMs	Please select
19 m	Stored Value Instruments	Please select
19 n	Trade Finance	Please select
19 o	Virtual Assets	No <input type="checkbox"/>
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	No <input type="checkbox"/>
19 p1a	If yes, state the applicable level of due diligence	Please select
19 p2	Wire transfers	No <input type="checkbox"/>
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p3	Foreign currency conversion	No <input type="checkbox"/>
19 p3a	If yes, state the applicable level of due diligence	Please select
19 p4	Sale of Monetary Instruments	No <input type="checkbox"/>
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, 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	Please select
22 b	Adverse Information Screening	Please select
22 c	Beneficial Ownership	Please select
22 d	Cash Reporting	Please select
22 e	CDD	Please select
22 f	EDD	Please select
22 g	Independent Testing	Please select
22 h	Periodic Review	Please select
22 i	Policies and Procedures	Please select
22 j	PEP Screening	Please select
22 k	Risk Assessment	Please select
22 l	Sanctions	Please select

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

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40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Please select
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Please select
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Please select
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Please select
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Please select
42	Does the Entity provide mandatory ABC training to:	
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		
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Please select
46 b	Terrorist financing	Please select
46 c	Sanctions violations	Please select
47	Are the Entity's policies and procedures updated at least annually?	Please select
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	Please select
48 a1	If Y, does the Entity retain a record of the results?	Please select
48 b	EU Standards	Please select
48 b1	If Y, does the Entity retain a record of the results?	Please select
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Please select
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Please select
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Please select
49 d	Prohibit accounts/relationships with shell banks	Please select
49 e	Prohibit dealing with another entity that provides services to shell banks	Please select
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Please select
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Please select
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Please select

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

58 e	Name Screening	Please select
58 f	Transaction Screening	Please select
58 g	Training and Education	Please select
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Please select
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context to the answers in this section.	
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

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69 a3	Trigger event	Please select
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Please select
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Please select
71 a	If Y, is this at:	
71 a1	Onboarding	Please select
71 a2	KYC renewal	Please select
71 a3	Trigger event	Please select
72	What is the method used by the Entity to screen PEPs?	Please select
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Please select
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Please select
74 a	If yes, select all that apply:	
74 a1	Less than one year	Please select
74 a2	1 – 2 years	Please select
74 a3	3 – 4 years	Please select
74 a4	5 years or more	Please select
74 a5	Trigger-based or perpetual monitoring reviews	Please select
74 a6	Other (Please specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Please select
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Please select
76 b	Respondent Banks	Please select
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Please select
76 c	Embassies/Consulates	Please select
76 d	Extractive industries	Please select
76 e	Gambling customers	Please select
76 f	General Trading Companies	Please select
76 g	Marjuana-related Entities	Do not have this category of customer or industry <input checked="" type="checkbox"/>
76 h	MSB/MVTS customers	Please select
76 i	Non-account customers	Please select
76 j	Non-Government Organisations	Please select
76 k	Non-resident customers	Please select
76 l	Nuclear power	Do not have this category of customer or industry <input checked="" type="checkbox"/>
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 <input checked="" type="checkbox"/>
76 r	Red light businesses/Adult entertainment	Do not have this category of customer or industry <input checked="" type="checkbox"/>
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 <input checked="" type="checkbox"/>
76 w	Used Car Dealers	Do not have this category of customer or industry <input checked="" type="checkbox"/>
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

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78 a	If Y indicate who provides the approval:	Please select
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Please select
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Please select
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
82	If appropriate, provide any additional information/context to the answers in this section.	
8. MONITORING & 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.	
9. PAYMENT TRANSPARENCY		
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Please select

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Please select
93 b	Local Regulations	Please select
93 b1	If Y, specify the regulation	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. SANCTIONS		
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. TRAINING & 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. QUALITY ASSURANCE /COMPLIANCE TESTING		
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)?	Please select
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Please select
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
13. AUDIT		
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Please select
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Please select
122 b	External Third Party	Please select
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Please select
123 b	Enterprise Wide Risk Assessment	Please select
123 c	Governance	Please select
123 d	KYC/CDD/EDD and underlying methodologies	Please select
123 e	Name Screening & List Management	Please select
123 f	Reporting/Metrics & Management Information	Please select
123 g	Suspicious Activity Filing	Please select
123 h	Technology	Please select
123 i	Transaction Monitoring	Please select
123 j	Transaction Screening including for sanctions	Please select
123 k	Training & Education	Please select
123 l	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Please select
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Please select
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
14. FRAUD		
127	Does the Entity have policies in place addressing fraud risk?	Please select
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Please select

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

Declaration Statement

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

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

Banco Bilbao Vizcaya Argentaria S.A., 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 holds accounts.

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

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

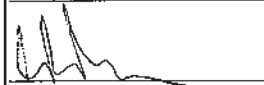
The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen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

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

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

I, 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)

 06/05/2026
(Signature & Date)