the Wolfsberg Group

	Financial Institution Name:	SGB Bank S.A.
	Location (Country) :	Poland
model are mater If a response for materially differe	rially similar to the LE Head Office. This questionnaire should not cover m or the LE differs for one of its branches, this needs to be highlighted and de rent than its Entity Head Office, a separate questionnaire can be completed	
No #	Question	Answer
1	Full Legal Name	SGB BANK S.A.
2		Appendix 1
3	Full Legal (Registered) Address	ULICA SZARYCH SZEREGÓW 23A, 60-462 POZNAŃ
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	12.11.1990
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	No
6 C	Government or State Owned by 25% or more	No
<u>6 d</u> 6 d1	Privately Owned If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	Yes Appendix 2
7	% of the Entity's total shares composed of bearer shares	None
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	no
10		Polish Financial Supervision Authority
11	Provide Legal Entity Identifier (LEI) if available	259400P9KF07OP2K5P83
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	NOT APPLICABLE
13	Jurisdiction of licensing authority and regulator of ultimate parent	NOT APPLICABLE

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

14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b	Private Banking	No
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	No
14 f	Financial Markets Trading	No
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	Yes
14 i	Multilateral Development Bank	No
	Wealth Management	
14 j		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	No
	customers? (Non-resident means customers primarily	NU
	resident in a different jurisdiction to the location where	
	bank services are provided)	
15 a	If Y, provide the top five countries where the non-	
	resident customers are located.	
16	Select the closest value:	
		501-1000
16 a	Number of employees	
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
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	
10	to the answers in this section.	
2. PRODUC	CTS & SERVICES	
19	Does the Entity offer the following products and services:	
15	bood and Entity offer and following products and corvices.	
<u>19 a</u>	Correspondent Banking	No
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking	
	services to domestic banks?	
19 a1b	Does the Entity allow domestic bank clients to	
19 8 10		
	provide downstream relationships?	
19 a1c	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	
	domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking	
louiu		
10 -1	services to foreign banks?	
19 a1e	Does the Entity allow downstream relationships	
	with foreign banks?	
19 a1f	with foreign banks? Does the Entity have processes and procedures	
19 a1f	Does the Entity have processes and procedures	
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with	
	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	
19 a1f 19 a1g	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking	
	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	
	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	
19 a1g	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	
	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships	
19 a1g	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	
19 a1g	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	
19 a1g 19 a1h	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
19 a1g 19 a1h 19 a1h1	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? MSBs	
19 a1g 19 a1h	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	

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

19 a1i	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	
	MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
<u>19 d</u>	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	Yes
19 f	International Cash Letter	No
19 g	Low Price Securities	Yes
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then	
131	offer third party payment services to their customers?	
	oner third party payment services to their customers?	Yes
19 i1	If Y, please select all that apply below?	
-	Third Party Payment Service Providers	
<u>19 i2</u>		Yes
<u>19 i3</u>	Virtual Asset Service Providers (VASPs)	Yes
19 i4	eCommerce Platforms	Yes
19 i5	Other - Please explain	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No
191	Sponsoring Private ATMs	No
-		
<u>19 m</u>	Stored Value Instruments	No
<u>19 n</u>	Trade Finance	Yes
<u>19 o</u>	Virtual Assets	No
19 p	For each of the following please state whether you	
-	offer the service to walk-in customers and if so, the	
	applicable level of due diligence:	
19 p1	Check cashing service	Yes
19 p1a		
	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	Yes
19 p2a	If yes, state the applicable level of due diligence	Due Diligence
19 p3	Foreign currency conversion	Yes
19 p3a	If yes, state the applicable level of due diligence	Due Diligence
19 p4	Sale of Monetary Instruments	Yes
19 n4a	If was state the applicable level of due diligence	
<u>19 p4a</u>	If yes, state the applicable level of due diligence	
<u>19 p4a</u> 19 p5	If you offer other services to walk-in customers	
	If you offer other services to walk-in customers please provide more detail here, including	
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	If you offer other services to walk-in customers please provide more detail here, including	
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	
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19 p5 19 q 20 20 a 21 <u>3. AML, CT</u> 22	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	Yes
19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise	Yes
19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening	Yes Yes Yes Yes
19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership	Yes
19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership	Yes Yes Yes Yes
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19 p5 19 q 20 20 a 21 3. AML, CT 22 a 22 a 22 b 22 c 22 d 22 e	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD	Yes
19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 c 22 d 22 e 22 f	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	Yes Y
19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 c 22 c 22 c 22 c 22 f 22 g	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Yes Y
19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 c 22 d 22 c 22 d 22 c 22 d 22 g 22 h	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Yes Y
19 p5 19 q 20 20 a 21 3. AML, CT 22 a 22 a 22 b 22 c 22 c 22 d 22 c 22 d 22 e 22 f 22 g 22 h 22 i	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes Yes
19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 c 22 d 22 c 22 d 22 c 22 d 22 g 22 h	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review POlicies and Procedures PEP Screening	Yes Y
19 p5 19 q 20 20 a 21 3. AML, CT 22 a 22 a 22 b 22 c 22 c 22 d 22 c 22 d 22 e 22 f 22 g 22 h 22 i	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes Yes
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	Suspicious Activity Reporting	Yes
22 m		
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML,	
25		11-100
	CTF & Sanctions Compliance Department?	
24	Is the Entity's AML, CTF & Sanctions policy approved at	
	least annually by the Board or equivalent Senior	
	Management Committee? If N, describe your practice in	Yes
	Question 29.	
25	Does the Board receive, assess, and challenge regular	
	reporting on the status of the AML, CTF, & Sanctions	Yes
	programme?	
26	Does the Entity use third parties to carry out any	
20	components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	
	,,,	
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	Yes
28 a	If N, clarify which questions the difference/s relate to	
20 a		
	and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context	
	to the answers in this section.	
	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and	Yee
	requirements to reasonably prevent, detect and report	Yes
	bribery and corruption?	
31	Does the Entity have an enterprise wide programme that	
31		Yes
	sets minimum ABC standards?	
32	Has the Entity appointed a designated officer or officers	
	with sufficient experience/expertise responsible for	Yes
	coordinating the ABC programme?	
33	Does the Entity have adequate staff with appropriate	
55		Yes
	levels of experience/expertise to implement the ABC	Tes
	programme?	
34	Is the Entity's ABC programme applicable to:	Not Applicable
	Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that:	Not Applicable
35	Does the Entity have a global ABC policy that:	Not Applicable
	Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This	Not Applicable
35	Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or	
35	Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	Not Applicable Yes
35	Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or	
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35 35 a	Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage	Yes
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35 35 a 35 b	Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials?	Yes
35 35 a	Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of	Yes
35 35 a 35 b	Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials?	Yes
35 35 a 35 b	Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of	Yes
35 35 a 35 b	Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy	Yes
35 35 a 35 b	Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy	Yes
35 35 a 35 b 35 c	Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? 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 Yes
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35 35 a 35 b 35 c 36	Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? 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)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment	Yes Yes Yes Yes
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35 35 a 35 b 35 c 36 37 38	Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? 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)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes Yes Yes Yes
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41 Does the Entity's internal audit function or other independent thick party cover A&D Polices and Proceedings? Yes 42 Does the Entity source ABC Polices and Proceedings? Yes 43 Does the Entity source ABC Polices and Proceedings? Yes 44 Stature of Defence Yes 42.1 Add Like of Defence Yes 42.2 Add Like of Defence Yes 42.4 Thight parties to which specific compliance activities students in ABC risk have been outpourced No 42.4 Thight parties to which specific compliance activities students in ABC risk have been outpourced No 43 Does the Entity provide ABC Taking that is tangeted to specific roles, responsibles and activities? Yes 44 Confirm that all responses provide in the above Section and the branchives that this applies to and the branchives that this applies to resplations and requirements to inclusione reliate to and the branchives that this applies to regulations and requirements to responsible provide regulations and requirements to responsible provide regulations and requirements to responsible provide and requirements to responsible provide regulations and requirements to responsible provide regulation and requirements to responsible provid	40 e	Changes in business activities that may materially	
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Icontraction/consultants) No 43 Does the Entity provide ABC training that is targeted to specific tokes, responsibilities and activities? Yes 44 Criffitm that all responses provided in the above Section and the branch/ses that this applies to. Yes 44.a If No, cliffy which questions the difference/sr relate to and the branch/ses that this applies to. Yes 45 If appropriate, provide any additional information/context to the answers in this section. Yes 46 Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctons regulations and requirements to reasonably provent, detected and inport. Yes 46 Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctons regulations and requirements to reasonably provent, detected and inport. Yes 47 Are the Entity procedures updated at least and procedures updated at least antip? Yes 48 U.S. Standards Yes 48 U.S. Standards Yes 48.1 U.S. Standards Yes 49 Does the Entity procedures updated at least anoved of the results? No 49 Does the Entity procedures updated at least anoved of the results? No 48 <td< th=""><th>-</th><th>Third parties to which specific compliance activities</th><th>No</th></td<>	-	Third parties to which specific compliance activities	No
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44 Continue that all responses provided in the above Section and representative of all the LE's baronches Yes 44.a If N, clafty which questions the difference's nelate to and the branch'se that this applies to. If appropriate, provide any additional information/context to the answers in this section. 45 If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. 46 Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report. Yes 46 a Money laundering Yes 47 Are the Entity policies and procedures annually? Yes 48 b Terrorist financing Yes 47 Are the Entity policies and procedures updated at least annually? Yes 48 all U.S. Standards Yes 49 b Discles and procedures that Yes 48 b EU standards Yes 49 b Bit If y does the Entity retain a record of the results? No 49 b Frohibit desping and keeping of ancommus for yes Yes 49 b Frohibit desping with other entity Yes 49 b	43		Yes
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b 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 humdering Yes 46 b Terrorist financing Yes 46 c Sanctions violations Yes 46 c Sanctions violations Yes 47 Are the Entity's policies and procedures updated at least annually? Yes 48 a U.S. Standards Yes 48 at U.S. Standards Yes 48 at U.S. Standards Yes 49 Does the Entity retain a record of the results? No 49 Does the Entity networks and rocedures that: Yes 49 Does the Entity networks accounts for unleased backs and/or NBPEIs Yes 49 d Prohibit the opening and keeping of accounts for unleased backs and/or NBPEIs Yes 49 d Prohibit dealing with onther entities that provide banking services to unleased banks Yes 49 d Prohibit dealing with another entity that provides exvicas to shell banks Yes 49 d	44 a	If N, clarify which questions the difference/s relate to	
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48 a U.S. Standards Yes 48 a1 If Y, does the Entity retain a record of the results? No 48 b EU Standards Yes 48 b1 If Y, does the Entity retain a record of the results? No 49 Does the Entity have policies and procedures that: No 49 a Prohibit the opening and keeping of anonymous and fotitious named accounts Yes 49 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Yes 49 c Prohibit dealing with other entities that provide banking services to unlicensed banks Yes 49 d Prohibit dealing with other entity that provide banking services to unlicensed banks Yes 49 e Prohibit deeling of accounts for Services to shell banks Yes 49 f Prohibit deeling of accounts for Services to shell banks Yes 49 g Prohibit deeling and keeping of accounts for Section 311 designated entities Yes 49 g Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Yes 49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close Yes	40		
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48 b EU Standards Yes 48 b1 If Y, does the Entity retain a record of the results? No No 49 Does the Entity have policies and procedures that: 49 49 a Prohibit the opening and keeping of anonymous and fictitious named accounts Yes 49 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Yes 49 c Prohibit dealing with other entities that provide banking services to unlicensed banks Yes 49 d Prohibit dealing with other entity that provides services to shell banks Yes 49 d Prohibit dealing with nother entity that provides services to shell banks Yes 49 f Prohibit dealing with another entity that provides services to shell banks Yes 49 f Prohibit dealing with another entity that provides services to shell banks Yes 49 f Prohibit opening and keeping of accounts for Section 311 designated entities Yes 49 g Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Yes 49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close Yes			
48 b1 If Y, does the Entity retain a record of the results? No 49 Does the Entity have policies and procedures that: Yes 49 a Prohibit the opening and keeping of anonymous and fictitious named accounts Yes 49 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Yes 49 c Prohibit dealing with other entities that provide banking services to unlicensed banks Yes 49 d Prohibit dealing with other entity that provides services to shell banks Yes 49 e Prohibit dealing with shell banks Yes 49 f Prohibit opening and keeping of accounts for Section 311 designated entities Yes 49 g Prohibit opening and keeping of accounts for augents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Yes 49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close Yes	-		
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49 d Prohibit accounts/relationships with shell banks Yes 49 e Prohibit dealing with another entity that provides services to shell banks Yes 49 f Prohibit opening and keeping of accounts for Section 311 designated entities Yes 49 g Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Yes 49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close Yes	49 c		Yes
49 e Prohibit dealing with another entity that provides services to shell banks Yes 49 f Prohibit opening and keeping of accounts for Section 311 designated entities Yes 49 g Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Yes 49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close Yes	49 d		Yes
49 f Prohibit opening and keeping of accounts for Section 311 designated entities Yes 49 g Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Yes 49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close Yes		Prohibit dealing with another entity that provides	
49 g Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Yes 49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close Yes	49 f	Prohibit opening and keeping of accounts for Section	Yes
49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close Yes	49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents,	Yes
foreign PEPs, including their family and close Yes	49 h		
	- 1 7 II	foreign PEPs, including their family and close	Yes

49 i	Define the process for escalating financial crime risk	
	issues/potentially suspicious activity identified by	Yes
	employees	
49 j	Define the process, where appropriate, for	M
	terminating existing customer relationships due to	Yes
40 k	financial crime risk Define the process for exiting clients for financial	
49 k	crime reasons that applies across the entity, including	Vas
	foreign branches and affiliates	165
49 I	Define the process and controls to identify and	
431	handle customers that were previously exited for	
	financial crime reasons if they seek to re-establish a	Yes
	relationship	
49 m	Outline the processes regarding screening for	
	sanctions, PEPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal	
4911	"watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or	
	similar document which defines a risk boundary around	Yes
	their business?	
51	Does the Entity have record retention procedures that	Yes
	comply with applicable laws?	Tes
51 a	If Y, what is the retention period?	
		5 years or more
52	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context	
	to the answers in this section.	
6 AML CTE	8 CANCTIONS DISK ASSESSMENT	
	& SANCTIONS RISK ASSESSMENT	
6. AML, CTF 54	Does the Entity's AML & CTF EWRA cover the inherent	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Ves
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes Yes
54 54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Yes
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	
54 54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Yes
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes Yes
54 54 a 54 b 54 c 54 d 55 55 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 55 55 a 55 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 b 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 55 d 55 a 55 b 55 c 55 c 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 b 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative	Yes Yes Yes Yes Yes Yes
54 54 a 54 c 54 c 55 a 55 b 55 c 55 c 55 d 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 c 54 c 54 d 55 a 55 a 55 b 55 c 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 f 55 g	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 c 54 d 55 55 a 55 b 55 c 55 d 55 f 55 g 55 h	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 f 55 g	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 c 54 d 55 55 a 55 b 55 c 55 d 55 f 55 g 55 h	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 c 54 c 55 d 55 a 55 b 55 c 55 d 55 d 55 f 55 f 55 f 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 c 54 c 55 d 55 a 55 b 55 c 55 d 55 d 55 f 55 f 55 f 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 c 54 c 55 d 55 a 55 b 55 c 55 d 55 d 55 f 55 f 55 f 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 d 55 f 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 c 54 c 55 d 55 a 55 b 55 c 55 d 55 d 55 f 55 f 55 f 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 55 b 55 c 55 c 55 d 55 f 55 g 56 56 57	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
54 54 a 54 c 54 c 55 d 55 a 55 c 55 c 55 d 55 d 55 f 55 f 56 56 57 57 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent	Yes
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 f 55 g 55 h 56 57 57 a 57 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
54 54 a 54 b 54 c 54 c 54 d 55 a 55 b 55 c 55 d 55 f 55 g 55 h 56 56 a 57 a 57 b 57 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes Y
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 f 55 g 55 h 56 57 57 a 57 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 c 54 d 55 55 a 55 b 55 c 55 d 55 d 55 f 55 g 55 h 56 56 57 57 a 57 b 57 c 57 d 58	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 56 a 57 a 57 c 57 d 58 58 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
54 54 a 54 b 54 c 54 d 55 a 55 b 55 c 55 d 56 a 57 a 57 d 57 d 58 a 58 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes Y
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 56 56 a 57 a 57 c 57 d 58 58 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes

58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the	
		Yes
	last 12 months?	
59 a	If N, provide the date when the last Sanctions EWRA	
	was completed.	
60	Confirm that all responses provided in the above Section	
		Yes
	are representative of all the LE's branches	
60 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
	and the branchies that this applies to.	
61	If appropriate, provide any additional information/context	
	to the answers in this section.	
7. KYC, CD	D and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	
	CDD must be completed, e.g. at the time of onboarding	Yes
		100
	or within 30 days?	
64	Which of the following does the Entity gather and retain	
04		
	when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied	
	to beneficial ownership identification?	25%
67	Does the due diligence process result in customers	Yes
	receiving a risk classification?	fes
67 a	If Y, what factors/criteria are used to determine the	
	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
	Business Type/Industry	
67 a3		Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	
	En el Malenda la compañía de la comp	
68	For high risk non-individual customers, is a site visit a	Yes
	part of your KYC process?	
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4	Other	
68 a4a	If yes, please specify "Other"	
	,, i, i, i,	
	Deep the Entity have a risk have deep state to the	
69	Does the Entity have a risk based approach to screening	
	customers for Adverse Media/Negative News?	Yes
69 a	If Y, is this at:	
	Onboarding	Vac
69 a1		Yes
69 a2	KYC renewal	Yes

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

70 -	If M is directed when a new ideas the same new sh	
78 a	If Y indicate who provides the approval:	
79	Does the Entity have specific procedures for onboarding	
	entities that handle client money such as lawyers,	Yes
	accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or quality	
00	review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section	
01		Yes
04 -	are representative of all the LE's branches	
81 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
82	If appropriate, provide any additional information/context	
02	to the answers in this section.	
	to the answers in this section.	
	RING & REPORTING	
83	Does the Entity have risk based policies, procedures and	
	monitoring processes for the identification and reporting	Yes
	of suspicious activity?	
84	What is the method used by the Entity to monitor	Automated
	transactions for suspicious activities?	
84 a	If manual or combination selected, specify what type	
	of transactions are monitored manually	
84 b	If automated or combination selected, are internal	Vendor-sourced tools
	system or vendor-sourced tools used?	
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is	
	the name of the vendor/tool?	
		Aml Asseco
	With a second distant to a literation of a table	
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring	
	When was the automated Transaction Monitoring application last calibrated?	< 1 year
	application last calibrated?	< 1 year
84 b3	application last calibrated? Does the Entity have regulatory requirements to report	
84 b3 85	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions?	< 1 year
84 b3	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and	< 1 year Yes
84 b3 85	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction	< 1 year
84 b3 85 85 a	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	< 1 year Yes
84 b3 85	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and	< 1 year Yes Yes
84 b3 85 85 a	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from	< 1 year Yes
84 b3 85 85 a 86	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	< 1 year Yes Yes
84 b3 85 85 a	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management	< 1 year Yes Yes
84 b3 85 85 a 86	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	< 1 year Yes Yes
84 b3 85 85 a 86	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management	< 1 year Yes Yes
84 b3 85 85 a 86	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all	< 1 year Yes Yes
84 b3 85 85 a 86 87	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	< 1 year Yes Yes
84 b3 85 85 a 86 87	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to	< 1 year Yes Yes Yes Yes
84 b3 85 85 a 86 87	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a	< 1 year Yes Yes Yes Yes
84 b3 85 85 a 86 87 88	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	< 1 year Yes Yes Yes Yes
84 b3 85 85 a 86 87 88	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have processes in place to send	<pre>< 1 year Yes Yes Yes Yes Yes Yes</pre>
84 b3 85 85 a 86 87 88 88 89	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	<pre>< 1 year Yes Yes Yes Yes Yes Yes Yes Yes</pre>
84 b3 85 85 a 86 87 88	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	<pre>< 1 year Yes Yes Yes Yes Yes Yes</pre>
84 b3 85 85 a 86 87 88 88 89 90	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	<pre>< 1 year Yes Yes Yes Yes Yes Yes Yes Yes</pre>
84 b3 85 85 a 86 87 88 89	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to	<pre>< 1 year Yes Yes Yes Yes Yes Yes Yes Yes</pre>
84 b3 85 85 a 86 87 88 89 90	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	<pre>< 1 year Yes Yes Yes Yes Yes Yes Yes Yes</pre>
84 b3 85 85 a 86 87 88 88 89 90	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to	<pre>< 1 year Yes Yes Yes Yes Yes Yes Yes Yes</pre>
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84 b3 85 85 a 86 87 88 88 89 90 90 a	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to	<pre>< 1 year Yes Yes Yes Yes Yes Yes Yes Yes</pre>
84 b3 85 85 a 86 87 88 88 89 90 90 a	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to If appropriate, provide any additional information/context	<pre>< 1 year Yes Yes Yes Yes Yes Yes Yes Yes</pre>
84 b3 85 85 a 86 87 88 88 89 90 90 a	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to If appropriate, provide any additional information/context	<pre>< 1 year Yes Yes Yes Yes Yes Yes Yes Yes</pre>
84 b3 85 85 a 86 87 88 88 90 90 90 a 91	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to If appropriate, provide any additional information/context to the answers in this section.	<pre>< 1 year Yes Yes Yes Yes Yes Yes Yes Yes</pre>
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84 b3 85 85 a 86 87 88 88 90 90 90 a 91	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? If N, clarify which questions the difference/s relate to and the branch/es that this applies to If appropriate, provide any additional information/context to the answers in this section.	<pre>< 1 year Yes Yes Yes Yes Yes Yes Yes Yes</pre>

93	Does the Entity have policies, procedures and	
	processes to comply with and have controls in place to	
	ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	Act of 1 March 2018 on Counteracting Money Laundering and Terrorist Financing
93 c	If N oveloin	
93 C	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section	V
	are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANCT		
98	Does the Entity have a Sanctions Policy approved by	
90	management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Automated
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Internal System
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Asseco AML
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Automated
105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data

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

115 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
	to the answers in this section.	
12 OUALIT	Y ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality	
	Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based	
	Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context	
	to the answers in this section.	
13. AUDIT 121	In addition to inspections by the government	
	supervisors/regulators, does the Entity have an internal	
	audit function, a testing function or other independent	Yes
	third party, or both, that assesses FCC AML, CTF, ABC,	
	Fraud and Sanctions policies and practices on a regular basis?	
122	How often is the Entity audited on its AML, CTF, ABC,	
	Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
<u>122 b</u> 123	External Third Party Does the internal audit function or other independent	18 months
125	third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and	Yes
400.1	procedures	
<u>123 b</u> 123 c	Enterprise Wide Risk Assessment Governance	Yes Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e	Name Screening & List Management	Yes
<u>123 f</u>	Reporting/Metrics & Management Information Suspicious Activity Filing	Yes
<u>123 g</u> 123 h	Technology	Yes Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123	Other (specify)	
124	Are adverse findings from internal & external audit	
	tracked to completion and assessed for adequacy and	Yes
	completeness?	
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context	
	to the answers in this section.	
14. FRAU	Does the Entity have policies in place addressing fraud	
127	risk?	Yes
128	Does the Entity have a dedicated team responsible for	Yes
	preventing & detecting fraud?	

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

Declaration Statement

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

SGB Bank 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, AGNIESZKA SROKA (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, Maciej Brązkowski (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)