## the Wolfsberg Group

Financial Institution Name: Location (Country):

International Investment Bank	
Russia	

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

No#	terially different than its Entity Head Office, a separate questionnaire car Question	Answer
	& OWNERSHIP	7.11.07.07
1	Full Legal Name	
		International Investment Bank
2	Append a list of foreign branches which are covered by	
	this questionnaire	MOSCOW BRANCH
		The Moscow branch is the only branch of the IIB
3	Full Legal (Registered) Address	
3	Full Legal (Registered) Address	
		7 Mashi Poryvaevoy Street, Moscow, 107078 Russian Federation
		. masin, stytusto, case, meser, in
4	Full Primary Business Address (if different from above)	
-	Date of Entity incorporation/catablishment	
5	Date of Entity incorporation/establishment	
		December 01, 1971
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	
o a i	symbol	
	Symbol	
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	Yes
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
•	The state of the s	
		None
	1	
8	Does the Entity, or any of its branches, operate under an	No
	Offshore Banking License (OBL)?	
8 a	If Y, provide the name of the relevant branch/es which	
	operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide	
•	services only through online channels?	no
10	Name of primary financial regulator/supervisory authority	
	galaxii aga a a a a a a a a a a a a a a a a a	
		Not applicable
11	Provide Legal Entity Identifier (LEI) if available	
		DET ACCORD IN DOTA ALCOHOL
		2534000PHLD27VN98Y03
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	
	amoreta from the Entity completing the DDQ)	Not applicable
13	Jurisdiction of licensing authority and regulator of ultimate	
	parent	
		Not applicable

14	Soloot the business areas applicable to the Estit.	
14	Select the business areas applicable to the Entity	。 [1] 《中国共和国共和国共和国共和国共和国共和国共和国共和国共和国共和国共和国共和国共和国
14 a	Retail Banking	No
14 b	Private Banking	No
14 c	Commercial Banking	No
14 d	Transactional Banking	No
14 e	Investment Banking	No
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	Yes
14 j	Wealth Management	No
14 k	Other (please explain)	The Bank finances projects aimed at ensuring sustainable development, which: promote economic cooperation; are consistent with the priorities of socio-economic development of the member countries; meet the criteria for responsible investment.
15	Does the Entity have a significant (10% or more) portfolio	
	of non-resident customers or does it derive more than	
	10% of its revenue from non-resident customers? (Non-	No.
	resident means customers primarily resident in a different	No
	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.	
40	Colort the electrical color	
16	Select the closest value:	。 第一章
16 a	Number of employees	51-200
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section 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 to the answers in this section.	
a ppopul	OTO & AFRICATO	
	CTS & SERVICES	
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	No
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking	
19 4 14	services to domestic banks?	
19 a1b	Does the Entity allow domestic bank clients to	
IBAID	provide downstream relationships?	
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with	
40 -4-1	domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking	
10 -1	services to foreign banks?	
19 a1e	Does the Entity allow downstream relationships with foreign banks?	
19 a1f	Does the Entity have processes and procedures in	
	place to identify downstream relationships with	
	foreign banks?	
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	
19 a1h	Does the Entity allow downstream relationships	
19 0111	with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	
19 a1h2	MVTSs	
19 a1h3	PSPs	
.o u i i i o		

Decision   Comparison   Compa			
place to identify downstream relationships will be seen and the provided of th	19 a1i	Does the Entity have processes and procedures in	
MSSs ANT SAPS-PS - No. 195			
19   Cross-Border (But Call Cellery   No   No   No   No   No   No   No   N			
19 c	10 h		No.
19			
19   Hotel Mari   No			
19   International Cash Letter   No			
19   Description   Programmer   No   Programmer   Progr			
Paymet Procupts Accounts   No			
Payment services to non-bank entitles who may then offer tried park payment services to the customers of the departs payment services to the customers of the park payment services to the customers of the park payment services to the customers of the payment services to the services to the payment services to the payment services to the services to the payment services to the services to the payment services to the payment services to the services to the services to the services to the payment services to the payment services to the serv	19 g		
ofter bird party payment services to their customers?  19 II	19 h		No
1911 If Y, Diesse select all that apply below? 1912 That Party Payment Sarvoce Providers No 1913 Virtual Asset Sarvoce Providers (VSPp) No 1914 Commerce Platforms No 1916 Orner - Please explain No 1917 Private Banking 1918 Private Banking 1918 Remote Deposit Capture (RICC) No 1919 Sponsoring Private ATMs No 1919 No 1919 Sponsoring Private ATMs No 1910 Trade Plannee 1910 Verse 1910 Trade Plannee 1910 Verse 1910 Trade Plannee 1910 Orfer the service to walkin customers and if so, the applicable level of the diligence 1917 Check cashing service 1917 Check cashing service 1917 Check cashing service 1919 Trade Plannee 1919 Trade Plannee 1919 Trade Plannee 1919 Trade Plannee 1910 Check cashing service 1919 Trade Plannee 1910 Check cashing service 1910 No 1914 State Plannee 1919 Trade Plannee 1910 Check cashing service 1910 Check cashing service 1910 Trade Plannee 1910 Check cashing service 1910 Check cashi	19 i	Payment services to non-bank entities who may then	
19 II If Y, please select all that apply below? 19 I2 Thard Party Partyment Services Providers (NSPs) No 19 I4 Commerce Platforms No 19 I4 Commerce Platforms No 19 I5 Over - Please explain None None None None None None None Non		offer third party payment services to their customers?	No.
19 13			
19 13			
19 1 Virtual Asset Service Providers (ASPs) No 19 14 Commerce Place explain  None  None  19 1 Private Banking 19 Remote Deposit Capture (RDC) No 19 Part (RDC) No 19 P			
19   19   Other - Please explain  19   Private Banking  19   Private Banking  19   Remote Deposit Capture (RDC)  19   Remote Deposit Capture (RDC)  19   Stored Value Instruments  10   St	19 i2		
19   Private Banking No. 19   Private Banking No. 19   Remote Deposit Capture (RDC) No. 19   Sponsoring Private ATMs No. 19   Sponsoring Private ATMs No. 19   Sponsoring Private ATMs No. 19   Trade Finance No. 19   Trade Finance No. 19   Trade Finance No. 19   Other Management Service No. 19   Other Sealing Service No. 19   Other Sealing Service No. 19   Private Assets No. 19   Other Sealing Service No. 19   Private Assets No. 19   Other Sealing Service No. 19   Private Assets No. 19   Other Sealing Service No. 19   Private Assets No. 19   Private Asse	19 i3	Virtual Asset Service Providers (VASPs)	No
Some content of the	19 i4	eCommerce Platforms	No
Private Banking   No		Other - Please explain	
Private Banking			
19 k Remote Depost Capture (RDC) No			None
19 k Remote Depost Capture (RDC) No			
19 k Remote Depost Capture (RDC) No			
19 k Remote Depost Capture (RDC) No	19 j	Private Banking	No
19 m Stored Vatile instruments No 19 n Trade Finance Yes 19 c Virtual Assets 10 c Virt		Remote Deposit Capture (RDC)	
19 m   Stored Value instruments   No     19 n   Trade Finance   Yes     19 c   Virtual Assets   No     19 p   For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence.     19 p1   Check cashing service   No     19 p1   Check cashing service   No     19 p1   The service to walk-in customers and if so, the applicable level of due diligence.     19 p2   Write transfers   No     19 p3   If yes, state the applicable level of due diligence.     19 p3   If yes, state the applicable level of due diligence.     19 p4   If yes, state the applicable level of due diligence.     19 p4   State of Monetary Instruments   No     19 p4   State of Monetary Instruments   No     19 p4   If yes, state the applicable level of due diligence.     19 p5   If you offer other services to walk-in customers     19 p4   If yes, state the applicable level of due diligence.     19 p5   If you offer other services to walk-in customers     19 p6   State of Monetary Instruments   No     19 p7   Province of the services and services identified by the Entity (please specify)     19 q			
19			
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			
offer the service to walk-in customers and if so, the applicable level of the diligence   No   19 p1   Check cashing service   No   19 p2   Wire transfers   No   19 p2   Wire transfers   No   19 p3   Fresign currency conversion   No   19 p3   Fresign currency conversion   No   19 p4   Sale of Monetary Instruments   No   19 p4   Sale of Monetary Instruments   No   19 p4   If yes, state the applicable level of due diligence   19 p5   If yes, state the applicable level of due diligence   19 p6   Sale of Monetary Instruments   No   19 p7   Sale of Monetary Instruments   No   19 p6   If you offer other services to walk-in customers   19 p6   If you offer other services to walk-in customers   19 p6   Other high-risk products and services identified by the   Entity (please specify)   None    20   Confirm that all responses provided in the above Section   21   If appropriate, provide any additional information/context to the answers in this section.   21   If appropriate, provide any additional information/context to the answers in this section.   22   Does the Entity have a programme that sets minimum   Aut., CTF and Sanctions standards regarding the following components:   22   Appointed Officer with sufficient experience/expertise   Yes   22   Appointed Officer with sufficient experience/expertise   Yes   22   Cob   Adverse information Screening   Yes   22   Cob   Cob   Yes   22   Cob   Cob   Yes   22   Felloc   Cob   Yes   22   Felloc   Procedures   Yes   22   Policies and Procedures   Yes   23   Policies and Procedures   Yes   24   Policies and Procedures   Yes			NO .
applicable level of due diligence: 19 p1	19 p		
19 p1 Check cashing service No 19 p2 Wire transfers No 19 p2 Wire transfers No 19 p2 Transfers No 19 p3 Transfers No 19 p3 Transfers No 19 p3 Transfers No 19 p3 Transfers No 19 p4 Sale of Monetary Instruments No 19 p4 Transfers No 19 p4 Transfers No 19 p5 Transfers No 19 p5 Transfers No 19 p6 Transfers No 19 p6 Transfers No 19 p6 Transfers No 19 p7 Transfers No 19 p6 Transfers No 19 p7 Transfers No 19 p6 Transfers No 19 p7 Transfers No 19 p7 Transfers No 19 p7 Transfers No 19 p8 Tran			医马克萨氏性性性外关系 医多种性皮肤 医克里克斯氏性丛外丛 化二苯基化 机克里拉克克 经营产的 化电流
19 pt			1 St. 1 St. 1 May 1 St.
19 p2	19 p1		
19 p2a	19 p1a	If yes, state the applicable level of due diligence	
19 p2a	19 p2	Wire transfers	No
19 p3			
19 p3			
19 p4a   Sale of Monetary Instruments   No			
19 p4a			
19 p5			
please provide more detail here, including describing the level of due diligence.  None  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, clarfy 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.  Ill does not offer current account or cash management services to customers  Ill does not offer current account or cash management services to customers  Ill does not offer current account or cash management services to customers  Ill does not offer current account or cash management services to customers  Ill does not offer current account or cash management services to customers  Ill does not offer current account or cash management services to customers  Ill does not offer current account or cash management services to customers  Ill does not offer current account or cash management services to customers  Ill does not offer current account or cash management services to customers  Ill does not offer current account or cash management services to customers  Ill does not offer current account or cash management services to customers  Ill does not offer current account or cash management services to customers  Ill does not offer current account or cash management services to customers  Ill does not offer current account or cash management services to customers  Ill does not offer current account or cash management services to customers  Ill does not offer current account or cash management services to customers  Ill does not offer current account or cash management services to customers  Ill does not offer current account or cash management services to customers  Ill does not offer current account or cash management services to customers  Ill does not offer current account or cash management services to customers  Ill does not offer current account or cash m			
describing the level of due diligence.  None  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 Spropriate, provide any additional information/context to the answers in this section.  Ill does not offer current account or cash management services to customers  3. AML, CTF & SANCTIONS PROGRAMME  22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  22 a Appointed Officer with sufficient experience/expertise Pes Beneficial Ownership Yes  22 b Adverse Information Screening Yes  22 c CoD Yes  22 c CoD Yes  22 1 EDD Yes  22 1 Independent Testing Yes  22 1 Periodic Review Yes  22 1 Pel Screening Yes  22 1 PEP Screening Yes  23 1 Risk Assessment Yes		If you offer other services to walk-in customers	
19 q Other high-risk products and services identified by the Entity (please specify)  20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  21 If appropriate, provide any additional information/context to the answers in this section.  21 If appropriate, provide any additional information/context to the answers in this section.  22 Does the Entity have a programme that sets minimum ANL, CTF and Sanctions standards regarding the following components: 22 a Apointed Officer with sufficient experience/expertise Pse 22 b Adverse Information Screening Pse 22 c Beneficial Ownership Yes 22 c CDD Yes 22 c CDD Yes 22 c CDD Yes 22 c CDD Yes 22 c Dependent Testing Pse 22 c Dependent Testing Pse 22 c Dependent Testing Pse 22 c Periodic Review Yes 22 c Periodic Review Yes Pse 22 c Periodic Review Yes Yes Pse 22 c Periodic Review Yes Yes Pse 22 c Periodic Review Yes Yes Risk Assessment Yes	19 bo		
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.  Ill does not offer current account or cash management services to customers  3. AML, CTF & SANCTIONS PROGRAMME  22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  22 a Appointed Officer with sufficient experience/expertise following components:  22 b Adverse information Screening Yes  22 c Beneficial Ownership Yes  22 d Cash Reporting Yes  22 e CDD Yes  22 f EDD Yes  22 g Independent Testing Yes  22 g Independent Testing Yes  22 h Periodic Review Yes  22 l Periodic Review Yes  22 l PEP Screening Yes  22 L Risk Assessment Yes  Periodic Review Yes  22 L Risk Assessment Yes	19 ps		
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.  Ill does not offer current account or cash management services to customers  3. AML, CTF & SANCTIONS PROGRAMME  22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  22 a Appointed Officer with sufficient experience/expertise following components:  22 b Adverse information Screening Yes  22 c Beneficial Ownership Yes  22 d Cash Reporting Yes  22 e CDD Yes  22 f EDD Yes  22 g Independent Testing Yes  22 g Independent Testing Yes  22 h Periodic Review Yes  22 l Periodic Review Yes  22 l PEP Screening Yes  22 L Risk Assessment Yes  Periodic Review Yes  22 L Risk Assessment Yes	19 ps		None
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.  Ill does not offer current account or cash management services to customers  3. AML, CTF & SANCTIONS PROGRAMME  22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  22 a Appointed Officer with sufficient experience/expertise following components:  22 b Adverse information Screening Yes  22 c Beneficial Ownership Yes  22 d Cash Reporting Yes  22 e CDD Yes  22 f EDD Yes  22 g Independent Testing Yes  22 g Independent Testing Yes  22 h Periodic Review Yes  22 l Periodic Review Yes  22 l PEP Screening Yes  22 L Risk Assessment Yes  Periodic Review Yes  22 L Risk Assessment Yes	19 po		None
20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  21 If appropriate, provide any additional information/context to the answers in this section.  21 If appropriate, provide any additional information/context to the answers in this section.  22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 Appointed Officer with sufficient experience/expertise 23 Adverse Information Screening 24 Adverse Information Screening 25 Beneficial Ownership 26 Cash Reporting 27 Yes 28 Cash Reporting 29 Pes 20 Cash Reporting 20 Pes 21 EDD 22 Independent Testing 29 Pes 20 Independent Testing 20 Pes 21 Pelicies and Procedures 22 Pes Screening 25 Pes Screening 26 Pes 27 Pes 28 Per Screening 29 Pes 20 Pes Cash Risk Assessment 20 Pes 20 Pes 21 Pes Carening 29 Pes 20 Pes 21 Pes Screening 20 Pes 21 Pes Screening 20 Pes 21 Risk Assessment 20 Pes 22 Risk Assessment 20 Pes 2		describing the level of due diligence.	None
20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  21 If appropriate, provide any additional information/context to the answers in this section.  22 If appropriate, provide any additional information/context to the answers in this section.  23 AML, CTF & SANCTIONS PROGRAMME  24 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 25 Appointed Officer with sufficient experience/expertise following components: 26 Adverse Information Screening Yes 27 Adverse Information Screening Yes 28 Cash Reporting Yes 29 CDD Yes 20 CDD Yes 20 CDD Yes 20 Independent Testing Yes 20 Independent Testing Yes 20 Periodic Review Yes 21 Per Screening Yes 22 Per Screening Yes 23 Per Screening Yes 24 Risk Assessment Yes		describing the level of due diligence.  Other high-risk products and services identified by the	None
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.  IllB does not offer current account or cash management services to customers  3. AML, CTF & SANCTIONS PROGRAMME  22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  22 a Appointed Officer with sufficient experience/expertise Pes 22 b Adverse Information Screening Pes 22 c Beneficial Ownership Pes 22 c Beneficial Ownership Pes 22 d Cash Reporting Pes 22 d CDD Pes 24 EDD Pes 25 EDD Pes 26 EDD Pes 26 EDD Pes 26 EDD Pes 27 EDD Periodic Review Pes 29 Independent Testing Pes 20 Periodic Review Pes 21 Pelicies and Procedures Pes 22 Pes 25 ED Periodic Review Pes 26 ED Periodic Review Pes 27 ED Periodic Review Pes 27 ED Periodic Review Pes 28 ED Periodic Review Pes 29 ED Periodic Review Pes 29 ED Periodic Review Pes 20 ED Periodic Review Pes 20 ED Periodic Review Pes 20 ED Periodic Review Pes 21 ED Per Screening Pes 22 ED Risk Assessment Pes 22 ED Risk Assessment Pes 22 ED Risk Risk Assessment Pes 22 ED Risk Risk Assessment Pes 22 ED Periodic Review Pes 22 ED Risk Risk Assessment Pes 22 ED Risk Risk Risk Risk Risk Risk Risk Risk		describing the level of due diligence.  Other high-risk products and services identified by the	
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.  IllB does not offer current account or cash management services to customers  3. AML, CTF & SANCTIONS PROGRAMME  22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  22 a Appointed Officer with sufficient experience/expertise Pes 22 b Adverse Information Screening Pes 22 c Beneficial Ownership Pes 22 c Beneficial Ownership Pes 22 d Cash Reporting Pes 22 d CDD Pes 24 EDD Pes 25 EDD Pes 26 EDD Pes 26 EDD Pes 26 EDD Pes 27 EDD Periodic Review Pes 29 Independent Testing Pes 20 Periodic Review Pes 21 Pelicies and Procedures Pes 22 Pes 25 ED Periodic Review Pes 26 ED Periodic Review Pes 27 ED Periodic Review Pes 27 ED Periodic Review Pes 28 ED Periodic Review Pes 29 ED Periodic Review Pes 29 ED Periodic Review Pes 20 ED Periodic Review Pes 20 ED Periodic Review Pes 20 ED Periodic Review Pes 21 ED Per Screening Pes 22 ED Risk Assessment Pes 22 ED Risk Assessment Pes 22 ED Risk Risk Assessment Pes 22 ED Risk Risk Assessment Pes 22 ED Periodic Review Pes 22 ED Risk Risk Assessment Pes 22 ED Risk Risk Risk Risk Risk Risk Risk Risk		describing the level of due diligence.  Other high-risk products and services identified by the	
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.  IllB does not offer current account or cash management services to customers  3. AML, CTF & SANCTIONS PROGRAMME  22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  22 a Appointed Officer with sufficient experience/expertise Pes 22 b Adverse Information Screening Pes 22 c Beneficial Ownership Pes 22 c Beneficial Ownership Pes 22 d Cash Reporting Pes 22 d CDD Pes 24 EDD Pes 25 EDD Pes 26 EDD Pes 26 EDD Pes 26 EDD Pes 27 EDD Periodic Review Pes 29 Independent Testing Pes 20 Periodic Review Pes 21 Pelicies and Procedures Pes 22 Pes 25 ED Periodic Review Pes 26 ED Periodic Review Pes 27 ED Periodic Review Pes 27 ED Periodic Review Pes 28 ED Periodic Review Pes 29 ED Periodic Review Pes 29 ED Periodic Review Pes 20 ED Periodic Review Pes 20 ED Periodic Review Pes 20 ED Periodic Review Pes 21 ED Per Screening Pes 22 ED Risk Assessment Pes 22 ED Risk Assessment Pes 22 ED Risk Risk Assessment Pes 22 ED Risk Risk Assessment Pes 22 ED Periodic Review Pes 22 ED Risk Risk Assessment Pes 22 ED Risk Risk Risk Risk Risk Risk Risk Risk		describing the level of due diligence.  Other high-risk products and services identified by the	
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.  IllB does not offer current account or cash management services to customers  3. AML, CTF & SANCTIONS PROGRAMME  22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  22 a Appointed Officer with sufficient experience/expertise following components:  22 b Adverse Information Screening Yes  22 c Beneficial Ownership Yes  22 d Cash Reporting Yes  22 e CDD Yes  22 e CDD Yes  22 f EDD Yes  22 g Independent Testing Yes  22 h Periodic Review Yes  22 l Policles and Procedures Yes  22 l Pel Screening Yes  22 l Pel Screening Yes  22 l Pel Screening Yes  22 k Risk Assessment Yes	19 q	describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)	
and the branch/es that this applies to.  21	19 q	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	None
21 If appropriate, provide any additional information/context to the answers in this section.  3. AML, CTF & SANCTIONS PROGRAMME  22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 a Appointed Officer with sufficient experience/expertise Pes 22 b Adverse Information Screening Pes 22 c Beneficial Ownership Yes 22 d Cash Reporting Yes 22 d Cash Reporting Yes 22 e CDD Yes 22 f EDD Yes 22 f EDD Yes 22 g Independent Testing Yes 22 h Periodic Review Yes 22 h Periodic Review Yes 22 i Policies and Procedures Yes 22 i Policies and Procedures Yes 22 k Risk Assessment Yes Yes 22 k Risk Assessment Yes	19 q	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.	None
to the answers in this section.    IIB does not offer current account or cash management services to customers	19 q	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	None
to the answers in this section.    IIB does not offer current account or cash management services to customers	19 q	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	None
to the answers in this section.    IIB does not offer current account or cash management services to customers	19 q	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	None
to the answers in this section.    IIB does not offer current account or cash management services to customers	19 q	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	None
IIB does not offer current account or cash management services to customers	19 q 20 20 a	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.	None
3. AML, CTF & SANCTIONS PROGRAMME  22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  22 a Appointed Officer with sufficient experience/expertise Yes  22 b Adverse Information Screening Yes  22 c Beneficial Ownership Yes  22 d Cash Reporting Yes  22 e CDD Yes  22 e CDD Yes  22 f EDD Yes  22 g Independent Testing Yes  22 g Independent Testing Yes  22 h Periodic Review Yes  22 i Policies and Procedures Yes  22 j PEP Screening Yes  22 k Risk Assessment Yes	19 q 20 20 a	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.	None
Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  22 a Appointed Officer with sufficient experience/expertise 22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes 22 d Cash Reporting Yes 22 d Cash Reporting Yes 22 f EDD Yes 22 f EDD Yes 22 g Independent Testing Yes 22 h Periodic Review Yes 22 i Policies and Procedures Yes 22 j PEP Screening Yes 22 k Risk Assessment Yes	19 q 20 20 a	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.	None Yes
Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  22 a Appointed Officer with sufficient experience/expertise 22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes 22 d Cash Reporting Yes 22 d Cash Reporting Yes 22 f EDD Yes 22 f EDD Yes 22 g Independent Testing Yes 22 h Periodic Review Yes 22 i Policies and Procedures Yes 22 j PEP Screening Yes 22 k Risk Assessment Yes	19 q 20 20 a	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.	None Yes
Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  22 a Appointed Officer with sufficient experience/expertise 22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes 22 d Cash Reporting Yes 22 d Cash Reporting Yes 22 f EDD Yes 22 f EDD Yes 22 g Independent Testing Yes 22 h Periodic Review Yes 22 i Policies and Procedures Yes 22 j PEP Screening Yes 22 k Risk Assessment Yes	19 q 20 20 a	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.	None Yes
AML, CTF and Sanctions standards regarding the following components:  22 a Appointed Officer with sufficient experience/expertise Yes 22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes 22 d Cash Reporting Yes 22 e CDD Yes 22 f EDD Yes 22 g Independent Testing Yes 22 g Independent Testing Yes 22 h Periodic Review Yes 22 i Policies and Procedures Yes 22 j PEP Screening Yes 22 k Risk Assessment Yes	19 q 20 20 a	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.	None Yes
following components:  22 a Appointed Officer with sufficient experience/expertise Yes  22 b Adverse Information Screening Yes  22 c Beneficial Ownership Yes  22 d Cash Reporting Yes  22 e CDD Yes  22 f EDD Yes  22 g Independent Testing Yes  22 h Periodic Review Yes  22 i Policies and Procedures Yes  22 j PEP Screening Yes  22 k Risk Assessment Yes	19 q 20 20 a 21	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.	None Yes
22 a         Appointed Officer with sufficient experience/expertise         Yes           22 b         Adverse Information Screening         Yes           22 c         Beneficial Ownership         Yes           22 d         Cash Reporting         Yes           22 e         CDD         Yes           22 f         EDD         Yes           22 g         Independent Testing         Yes           22 h         Periodic Review         Yes           22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes	19 q 20 20 a 21	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.	None Yes
22 b         Adverse Information Screening         Yes           22 c         Beneficial Ownership         Yes           22 d         Cash Reporting         Yes           22 e         CDD         Yes           22 f         EDD         Yes           22 g         Independent Testing         Yes           22 h         Periodic Review         Yes           22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes	19 q 20 20 a 21	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.	None Yes
22 b         Adverse Information Screening         Yes           22 c         Beneficial Ownership         Yes           22 d         Cash Reporting         Yes           22 e         CDD         Yes           22 f         EDD         Yes           22 g         Independent Testing         Yes           22 h         Periodic Review         Yes           22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes	20 20 a 21 3. AML, C	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.	Yes  IIB does not offer current account or cash management services to customers
22 c         Beneficial Ownership         Yes           22 d         Cash Reporting         Yes           22 e         CDD         Yes           22 f         EDD         Yes           22 g         Independent Testing         Yes           22 h         Periodic Review         Yes           22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes	20 20 a 21 3. AML, C	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.	Yes  IIB does not offer current account or cash management services to customers
22 d         Cash Reporting         Yes           22 e         CDD         Yes           22 f         EDD         Yes           22 g         Independent Testing         Yes           22 h         Periodic Review         Yes           22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes	20 20 a 21 3. AML, C	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.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise	Yes  IIB does not offer current account or cash management services to customers  Yes
22 e         CDD         Yes           22 f         EDD         Yes           22 g         Independent Testing         Yes           22 h         Periodic Review         Yes           22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes	20 20 a 21 3. AML, C 22 22 a 22 b	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.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening	None  Yes  IIB does not offer current account or cash management services to customers  Yes Yes
22 f         EDD         Yes           22 g         Independent Testing         Yes           22 h         Periodic Review         Yes           22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes	20 20 a 21 3. AML, C 22 22 a 22 b 22 c	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.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership	None  Yes  IIB does not offer current account or cash management services to customers  Yes Yes Yes Yes
22 g         Independent Testing         Yes           22 h         Periodic Review         Yes           22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes	20 20 a 21 3. AML, C <sup>2</sup> 22 a 22 b 22 c 22 d	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.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting	None  Yes  IIB does not offer current account or cash management services to customers  Yes Yes Yes Yes Yes Yes
22 h         Periodic Review         Yes           22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes	20 20 a  21 3. AML, C  22 a  22 b  22 c  22 d  22 c	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.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD	None  Yes  IIB does not offer current account or cash management services to customers  Yes Yes Yes Yes Yes Yes
22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes	20 20 a  21 22 a 22 b 22 c 22 d 22 d 22 d 22 d 22 d	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.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD	None  Yes  IIB does not offer current account or cash management services to customers  Yes Yes Yes Yes Yes Yes Yes Yes
22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes	20 20 a  21 22 a  22 b  22 c  22 d  22 f  22 g	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.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing	None  Yes  IIB does not offer current account or cash management services to customers  Yes Yes Yes Yes Yes Yes Yes Yes Yes Y
22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes	20 20 a  21 22 a  22 b  22 c  22 d  22 f  22 g	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.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  Independent Testing  Periodic Review	None  Yes  IIB does not offer current account or cash management services to customers  Yes Yes Yes Yes Yes Yes Yes Yes Yes Y
22 k Risk Assessment Yes	20 20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	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.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  Independent Testing  Periodic Review	None  Yes  IIB does not offer current account or cash management services to customers  Yes Yes Yes Yes Yes Yes Yes Yes Yes Y
	20 20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 h	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.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing  Periodic Review  Policies and Procedures	None  Yes  IIB does not offer current account or cash management services to customers  Yes  Yes  Yes  Yes  Yes  Yes  Yes
	20 20 a  21 22 a  22 b  22 c  22 c  22 d  22 e  22 f  22 g  22 h  22 i  22 j	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.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing  Periodic Review  Policies and Procedures  PEP Screening	None  Yes  IIB does not offer current account or cash management services to customers  Yes Yes Yes Yes Yes Yes Yes Yes Yes Y
	20 20 a  21 22 a  22 b  22 c  22 d  22 f  22 g  22 h  22 j  22 k	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.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing  Periodic Review  Policies and Procedures  PEP Screening  Risk Assessment	None  Yes  IIB does not offer current account or cash management services to customers  Yes  Yes  Yes  Yes  Yes  Yes  Yes

25 a. Transaction Motioning Very 15 and 15 a	22	Consistent Ashirth December	
Transaction Monotoning   Transaction   Transaction Monotoning   Transaction Monotoning   Transaction   Transaction Monotoning   Transaction   Transaction Monotoning   Transaction   Transaction Monotoning   Transaction   Transaction   Transaction Monotoning   Transaction   Transaction   Transaction   Transaction   Transaction   Transaction   Transaction   Transaction   Transaction   Transacti	22 m	Suspicious Activity Reporting Training and Education	Yes
15 downway ful time emproyees are in the Entry a AMI, 15 of The American Committee 79 in September 1 of the Committee 79 in Section 2 of the Committee 79 in Section			
The Scancions Compliance Department?  If the Devils AML, CTP & action peolicy approved at Management Committees 2 M, describe your practice in Question 2 Cover the Board receive, sussess and control of the Cover the			
least arrowardy by the Board or equivalent Short or Attachment Committee? It is described your profession of the Stand of the Author Committee? It is described by the Stand of the Author Comparation of the Stand of the Author Comparation of the Stand of the Author Comparation o			1-10
Management Committee? If It, describe your practice in Control	24		
Oueston 73.  Oues the Board rooks, assess, and challenge regular reporting on the status of the AML, CFT, & Sanctions Programmen?  The Components of Is AML, CFT & Sanctions programmen?  The Components of Is AML, CFT & Sanctions programmen?  The Components of Is AML, CFT & Sanctions programmen?  The Components of Is AML, CFT & Sanctions programmen?  The Components of Is AML, CFT & Sanctions programmen?  The Components of Is AML, CFT & Sanctions programmen?  The Components of Is AML, CFT & Sanctions programmen?  The Components of Is AML, CFT & Sanctions programmen?  The Components of Is AML, CFT & Sanctions programmen?  The Components of Is AML, CFT & Sanctions programmen and the Eventure Is a space of Is a component of Is AML, CFT and Sanctions policy are already approved. Board takes a decision to update the policy if it is required the to internal changes to the AML, CFT and Sanctions policy are already approved. Board takes a decision to update the policy if it is required the to internal changes to the AML, CFT and Sanctions policy are already approved. Board takes a decision to update the policy if it is required the to internal changes to the AML, CFT and Sanctions policy are already approved. Board takes a decision to update the policy if it is required the to internal changes to the AML, CFT and Sanctions policy are already approved. Board takes a decision to update the policy if it is required the to internal changes to the AML, CFT and Sanctions policy are already approved. Board takes a decision to update the policy if it is required the to internal changes to the AML, CFT and Sanctions policy are already approved. Board takes a decision to update the policy if it is required the to internal changes to the AML, CFT and Sanctions policy are already approved. Board takes a decision to update the policy of the internal changes are the policy and the policy approved.  The The Components of the AML Components and designated officer or officers with substitution of the AML Components and the policy approved			No
Cost in the Sound receive, assess, and challenge regular reporting on the situation of the AML, CFT, & Sandtoins programme?   No			
reporting on the status of the AML_CFT_ & Sanctions   Yea    18	25		
26 a Constraint of Enthy Law Enth of parties to carry out any components of ta AML, CFT American programme?  27 Does the enthy have a whistleticouse policy?  28 a Confirm that all responses provided in the above Section are representative of all the LE branches and the spoke to the confirmation of the activity of the a		reporting on the status of the AML, CTF, & Sanctions	Yes
components of its ANL, CFF & Sanctions programme?  If Y, provide further details  If Y, provide further details  Yes  Confirm but at responses provide in the above Section ANL, CFF and Sanctions policy are already approved. But this applies to and the branchies that this applies to.  If appropriate, provide any additional information/context to the answers in his section.  If appropriate, provide any additional information/context to the answers in his section.  ANL, CFF and Sanctions policy are already approved. Board takes a decision to update the policy if it is trouvied due to internal changes in the Batis or due to externalistics. Compliance department is responsible unit to present for Board consideration changes to the ANL, CFF and Sanctions policy are already approved. Board takes a decision to update the policy if it is trouvied due to internal changes in the Batis or due to externalistics. Compliance department is responsible unit to present for Board consideration changes to the ANL, CFF and Sanctions policy are already approved. Board takes a decision to update the policy if it is trouvied due to internal changes in the Batis or due to externalistics. Compliance department is responsible unit to present for Board consideration changes to the ANL, CFF and Sanctions policy are already approved. Board takes a decision to update the policy if it is trouvied for Board consideration changes to the ANL, CFF and Sanctions policy are already approved. Board takes a decision to update the policy if it is trouvied for Board consideration changes to the ANL, CFF and Sanctions policy are already approved.  AML CFF and Sanctions policy are already approved to externalistics. Compliance department is responsible unit to present for Board consideration and report and report and report to external changes in the Batistics of the Sanctions and report and			
27 Does the entity have a winstitledower policy? 28 Confirm that all responses provided in the above Section of all the LE's branches. 29 If appropriate, provide any additional information/context to the answer in this sections had this applies to the answer in this sections and interest to the answer in this section is described by the section of t	26		No
27 Does the entity have a whistleblower policy? 28 Confirm that all responses provided in the above Section 29 are representative of all the LEP branches 29 and the branches that this applies to. 29 If appropriate, provide any additional information-context to the answers in this section.  29 If appropriate, provide any additional information-context to the answers in this section.  29 ANTI BRIBERY & CORRUPTION  4. ANTI BRIBERY & CORRUPTION  10 As the Entity thou-contended policies and procedures consistent with applicable follow provided and procedures consistent with applicable follow provided and procedures consistent with applicable follow provided and procedures 20 Contended the Entity through the Entity through the City districts and 21 As the Entity documented policies and procedures 22 Has the Entity applicable follow provided and procedures 23 Contended the Entity through the Entity t	20.0		
28 a Confirm that all responses provided in the above Section and representative of all the LES branches and the branches that this applies to and the branches that this applies to and the branches that this applies to the animum and additional informationicontext to the animum in the section.  29 If appropriate, provide any additional informationicontext to the animum in the section.  20 If appropriate, provide any additional informationicontext to the animum in the section.  20 If appropriate, provide any additional informationicontext to the animum in the section.  20 If appropriate, provide any additional informationicontext to the animum in the section.  21 If appropriate, provide any additional informationicontext to the animum in the section.  22 If appropriate provide any additional informationicontext to the animum in the section.  23 If appropriate provide any additional informationicontext to the section in the section in the section of the	26 a	if Y, provide further details	
28 a Confirm that all responses provided in the above Section and representative of all the LES branches and the branches that this applies to and the branches that this applies to and the branches that this applies to the animum and additional informationicontext to the animum in the section.  29 If appropriate, provide any additional informationicontext to the animum in the section.  20 If appropriate, provide any additional informationicontext to the animum in the section.  20 If appropriate, provide any additional informationicontext to the animum in the section.  20 If appropriate, provide any additional informationicontext to the animum in the section.  21 If appropriate, provide any additional informationicontext to the animum in the section.  22 If appropriate provide any additional informationicontext to the animum in the section.  23 If appropriate provide any additional informationicontext to the section in the section in the section of the			
28 a Confirm that all responses provided in the above Section and representative of all the LES branches and the branches that this applies to and the branches that this applies to and the branches that this applies to the animum and additional informationicontext to the animum in the section.  29 If appropriate, provide any additional informationicontext to the animum in the section.  20 If appropriate, provide any additional informationicontext to the animum in the section.  20 If appropriate, provide any additional informationicontext to the animum in the section.  20 If appropriate, provide any additional informationicontext to the animum in the section.  21 If appropriate, provide any additional informationicontext to the animum in the section.  22 If appropriate provide any additional informationicontext to the animum in the section.  23 If appropriate provide any additional informationicontext to the section in the section in the section of the			
28 a Confirm that all responses provided in the above Section and representative of all the LES branches and the branches that this applies to and the branches that this applies to and the branches that this applies to the animum and additional informationicontext to the animum in the section.  29 If appropriate, provide any additional informationicontext to the animum in the section.  20 If appropriate, provide any additional informationicontext to the animum in the section.  20 If appropriate, provide any additional informationicontext to the animum in the section.  20 If appropriate, provide any additional informationicontext to the animum in the section.  21 If appropriate, provide any additional informationicontext to the animum in the section.  22 If appropriate provide any additional informationicontext to the animum in the section.  23 If appropriate provide any additional informationicontext to the section in the section in the section of the	27	Does the entity have a whistlehlower policy?	Vac
and representative of all the LEs branches  If Appropriate, provide any additional informationicontext on the tranchises that this applies to.  If appropriate, provide any additional informationicontext to the answers in this section.  A ANTI SRIBERY & CORRUPTION  14 ANTI SRIBERY & CORRUPTION  15 Desethe Entity have an after designated officer or officers consistent with applicable MRX (regulations and provider and consideration changes to the AML_CFT and Sanction policy.)  16 Desethe Entity have an anteriorist wide professional elevate of experimental propositions and set in the Entity appointed adeignated officer or officers with sufficient experiment proposition.  17 Desethe Entity appointed adeignated officer or officers with sufficient experiment proposition.  18 Desethe Entity have an additional information contains an advantage.  29 Includes enhanced requirements responsible for with problem of the Entity have an additional proposition of the Entity have an advantage.  29 Desethe Entity have an ABC Entity appointed in the Legal Entity in the Entity appointed in the Legal Entity in the Entity appointed in the Legal Entity in the Legal Entity in the Entity appointed in the Legal Entity in the Compartment of the Entity in the Compartment with the Compartment in the Compartment in the Internet in the Compiler of the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the last 12 months?  29 Desethe Entity have an ABC Entity desether and the Compiler of the Entity in the Entity in the Compiler of the Entity in the Entity in the Entit			
### and the branch/es that this applies to.  ### appropriate, provide any additional information/context to the answers in this section.  ### ANTI BRIBERY & CORRUPTION  ### BIT BERY &			Yes
### ### ### ### ### ### ### ### ### ##	28 a		
to the answers in this section.  due to infranti-change in the Bank or due to externalities. Complance department is responsible unit to present for Board consideration changes to the AML, CFT and Sanction policy.  4. ANTI BRISERY & CORRUPTION  30		and the branch/es that this applies to.	
to the answers in this section.  due to infranti-change in the Bank or due to externalities. Complance department is responsible unit to present for Board consideration changes to the AML, CFT and Sanction policy.  4. ANTI BRISERY & CORRUPTION  30			
to the answers in this section.  due to infranti-change in the Bank or due to externalities. Complance department is responsible unit to present for Board consideration changes to the AML, CFT and Sanction policy.  4. ANTI BRISERY & CORRUPTION  30			
due to internal changes in the Bank or due to externalities. Compliance department is responsible unit to present for Doard consideration changes to the AML, CFT and Sanction policy.  4. ANTI BRBERY & CORRUPTION  30 Part in Entity protective processes and the procedures requirements for associated with applicable ASC regulations and requirements for associated programme that sets minimum ABC standards?  31 Ones the Entity have an enterprise wide programme that sets minimum ABC standards?  32 Has the Entity applicated a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?  33 Dives the Entity have adequate saff with appropriate programme?  34 Is the Entity's ABC programme applicable to:  35 Dives the Entity have a policial ABC project that includes promising, offering, priving, soliciation or receiving of anything of value, directly or indirectly, if reproperly intended to influence action or orbain an advantage.  35 Let a prohibitor against the faitification of books and excords (this map be within the ABC policy or anything on the status of the ABC programme?  36 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  37 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  38 Designation of the status of the ABC programme?  39 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  40 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  40 Does the Entity have controls in place to monitor the inherent risk assessment?  40 Does the Entity have controls in place to monitor the inherent risk assessment?  40 Does the Entity have controls in place to monitor the inherent risk assessment?  40 Does the Entity have controls in place to monitor the inherent risk assessment?  40 Does the Entity have controls the place to monitor the inherent risk assessment?  40 Does the Entity have controls the controls an	29		AMI_CET and Sanctions policy are already approved. Board takes a decision to undate the policy if it is security at
for Board consideration changes to the AML, CFT and Sanction policy.  4. ANTI BRIBERY & CORRUPTION  30 Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, debet and report sets minimum ABC standards?  31 Does the Entity have an enterprise wide programme that sets minimum ABC standards?  32 Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?  33 Does the Entity have advantage to:  34 Is the Entity SABC programme applicable to:  35 Does the Entity have a double ABC policy that:  36 Does the Entity have and officers or officers with superposition of the Entity three and the Entity three Entity three and the Entity three and the Entity three Entity three Entity three and the Entity three Entity three and three and three three Entity three Entity three and three Entity three Enti		to the answers in this section.	
The state of the s			
The state of the s	A ANTED	DIBERY & CORDURTION	
consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?  Toes the Entity have an enterprise wide programme that sets minimum ABC standards?  Has the Entity's appointed a designated officer or officers with sufficient experience/expense reaponsible for coordinating the ABC programme?  Does the Entity's ABC programme applicable to:  Does the Entity's ABC programme applicable to:  Prohibits the giving and receiving of totales? 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  To 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's ABC programme?  Does the Entity's ABC programme?  Does the Entity's ABC programme and challenger regular reporting on the status of the ABC programme?  Does the Entity's ABC programme?  Does the Entity			
requirements to reasonably prevent, detect and report bribery and corruption?  11 Does the Entity have an enterprise wide programme that sets minimum ABC standards?  12 Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?  13 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?  14 Is the Entity ABC programme applicable to:  15 Does the Entity have a global ABC policy that:  15 a Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicutation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obbin and solvaritage.  15 b Includes entitle and the ABC policy or any other policy applicable to the Legal Entity)?  16 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  17 Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  18 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  19 Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  29 Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  29 Does the Entity have an ABC residual risk rating that is the effectiveness of their ABC programme?  20 Does the Entity have an ABC residual risk rating that is the effectiveness and the entity after the inherity after certain of the network of the challenge of the inherity after providers as appropriate on the inherity and providers as appropriate on the result of the one ontole effectiveness and the entity after associated with the countries and industries in which the Entity does business, directly or yes through Intermediaties.	00		
sets minimum ABC standards?  22 Has the Entity Apocinted a designated officer or officers with sufficient experience/expertise reportable for coordinating the ABC programme?  33 Obes the Entity have adequate staff with appropriate levels of experience/expertise rol implement the ABC programme?  34 Is the Entity ABC programme applicable to:  35 Obes the Entity have a global ABC policy that:  36 Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  35 b Includes enhanced requirements regarding interaction with public efficiels?  36 The Company of t			Yes
sets minimum ABC standards?  2 Has the Entity approtised a designated officer or officers with sufficient experience/expertise or responsible for coordinating the ABC programme?  33 Does the Entity have adequate starf with appropriate levels of experience/expertise to implement the ABC programme?  34 Is the Entity ABC programme applicable to:  35 Does the Entity have a global ABC policy that:  36 Does the Entity have a global ABC policy that:  37 Includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  35 b Includes enhanced requirements regarding interaction with public officials?  36 Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  36 Does the Entity have controls in place to monitor the effectiveness of the HaBC programme?  37 Does the Entity have controls in place to monitor the effectiveness of the HaBC programme?  38 Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  40 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity have an ABC EWRA cover the inherent risk components detailed below.  40 Does the Entity providers as appropriate  40 Description in the state of the ABC programme?  40 Description in the state of the ABC programme?  40 Description in the state of the ABC programme?  40 Description in the state of the ABC programme?  40 Description in the state of the ABC programme?  40 Description in the state of the ABC programme?  41 Description in the state of the ABC programme?  42 Description in the state of the ABC programme?  43 Description in the state of the ABC programme?  44 Description in the ABC programme?  45 Description in the ABC programme?  46 Description in the ABC programme?  47 Description in the ABC programme?			
Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?  32 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?  34 Is the Entity's ABC programme applicable to:  35 Does the Entity have a global ABC policy that:  36 Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  35 D Includes enhanced requirements regarding interraction with public officials?  36 D Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  36 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  37 Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  38 Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  40 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and industries in which the Entity does business, directly or through intermediaries  40 Description in the Entity does business, directly or through intermediaries  40 Description in the Entity does business, directly or through intermediaries  40 Description in the Entity does business, directly or three through intermediaries  41 Description in the Entity of the Entity or	31		Yes
with sufficient experience/experise responsible for coordinating the ABC programme?  33 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?  34 Is the Entity SABC programme applicable to:  35 Does the Entity have a global ABC policy that:  35 Does the Entity have a global ABC policy that:  36 Prohibits the giving and receiving of arrhing of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  35 Dincludes enhanced requirements regarding interaction with public officials?  36 Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  36 Does the Entity have controls in place to monitor the effectiveness of the HaBC programme?  37 Does the Entity have controls in place to monitor the effectiveness of the HaBC programme?  38 Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  40 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity have an ABC EWRA cover the inherent risk components detailed below.  40 Does the Entity providers as appropriate  40 Descriptions in which the Entity does business, directly or through intermediaries and other through intermediaries. Further through intermediaries and other through intermediaries.	32		
Does the Entity have adequate staff with appropriate tevels of experience/expertise to implement the ABC programme?  34 Is the Entity's ABC programme applicable to: 35 Does the Entity have a global ABC policy that: 36 Prohibits the giving and receiving of brobes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly, if improperly intended to influence action or obtain an advantage  35 b Includes a prohibition against the fatsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  36 c Includes a prohibition against the fatsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  37 Does the Entity have controls in place to monitor the effectiveness of their ABC, programme?  38 A Bush Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last L2 months?  39 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity have a pagnorate to the controls effectiveness and industries in which the Entity order by intermediaries and other third-party providers as appropriate  40 Corruption risks associated with the countries and industries in which the Entity does business, directly or though intermediaries  40 Transactions, products or services, including those that involve state-controlled entities or ves			Yes
levels of experience/expertise to implement the ABC programme?  34 Is the Entity's ABC programme applicable to: 35 Does the Entity have a global ABC policy that: 36 a Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  35 b Includes enhanced requirements regarding interaction with public officials?  36 c Includes a prohibition against the fallification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  36 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  37 Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  38 Has the Entity ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  40 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and other third-party providers as appropriate  40 Complete in the Entity does business, directly or through intermedianes  40 Tocoruption risks associated with the countries and industries in which the Entity does business, directly or through intermedianes  40 Transactions, products or services, including those that involve state-controlled entities or verse.			
Second   S	33		V
Set   Description   Set			Yes
Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of tribles? 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 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)?  Pes  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?  Pes  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  Corruption risks associated with the countries and industries in which the Entity does business, directly or the third-party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or the third-party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or the third-party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or the third-party providers as appropriate  The Corruption risks associated with the countries and industries in which the Entity does business, directly or the third-party providers as appropriate  The Corruption risks associated with the	34		Both joint ventures and third parties acting on behalf of the Entity
includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  35 b Includes enhanced requirements regarding interaction with public officials?  36 c Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  36 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  37 Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  38 Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  39 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk assessment (EWRA) as a proportion of the controls effectiveness and the inherent risk assessment?  40 Potential liability created by intermediaries and other third-party providers as appropriate and industries in which the Entity does business, directly or through intermediaries  40 Transactions, products or services, including those that involve state-owner or state-controlled entities or Yes			The same of the sa
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 (fils may be within the ABC policy or any other policy applicable to the Legal Entity)?  Yes  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?  If N, provide the date when the last ABC EWRA was completed.  If N, provide the date when the last ABC EWRA was completed.  Jose the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Oose the Entity's ABC EWRA cover the inherent risk components detailed below.  Does the Entity's ABC EWRA cover the inherent risk components detailed below.  Oncomponents detailed below.  Potential liability created by intermediaries and other lind-party providers as appropriate  Observations of the control of the co	35 a		
improperly intended to influence action or obtain an advantage  35 b 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)?  Se 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?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  As Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the rinherent risk assessment?  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the rinherent risk assessment?  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the rinherent risk assessment?  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the rinherent risk assessment?  Components detailed below.  Components detailed below.  Components detailed below.  Transactions, products or services, including those that involves state-owned or state-controlled entities or that involves state-owned or state-controlled entities or that involves state-owned or state-controlled entities or the trinher received.			Von
advantage Includes enhanced requirements regarding interaction with public officials?  35 c Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  36 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  37 Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  38 Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  39 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below.  40 Potential liability created by intermediaries and other third-party providers as appropriate  40 Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries.			165
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)?  36 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  37 Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  38 Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  39 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 Potential liability created by intermediaries and other third-party providers as appropriate  40 Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 Transactions, products or services, including those that involve state-owned or state-controlled entities or Yes			
Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  36 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  37 Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  38 Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  39 If N, provide the date when the last ABC EWRA was completed.  39 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 Potential liability created by intermediaries and other third-party providers as appropriate  40 Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 Transactions, products or services, including those that involve state-owned or state-controlled entities or Yes	35 b		Yes
and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  36 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  37 Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  38 Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  38 If N, provide the date when the last ABC EWRA was completed.  39 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 Potential liability created by intermediaries and other third-party providers as appropriate  40 Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries in which the Entity does business, directly or through intermediaries, products or services, including those that involve state-controlled entities or Yes	25.0		
other policy applicable to the Legal Entity)?  26 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  27 Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  28 Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  29 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 a Potential liability created by intermediaries and other third-party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-controlled entities or Yes	35 C		
Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Toes 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?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity ABC EWRA cover the inherent risk components detailed below:  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Torruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  Transactions, products or services, including those that involve state-controlled entities or Yes			Yes
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?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Components detailed below:  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  Transactions, products or services, including those that involve state-owned or state-controlled entities or Yes			
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?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Components detailed below:  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  Transactions, products or services, including those that involve state-owned or state-controlled entities or Yes	36	Does the Entity have controls in place to monitor the	
reporting on the status of the ABC programme?  38 Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  39 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 a Potential liability created by intermediaries and other third-party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-counted entities or Yes			Yes
Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  38 a If N, provide the date when the last ABC EWRA was completed.  39 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 a Potential liability created by intermediaries and other third-party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-covned or state-controlled entities or Yes	37	Does the Board receive, assess, and challenge regular	Vac
(EWRA) been completed in the last 12 months?  Yes  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Potential liability created by intermediaries and other third-party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  Corruptions, products or services, including those that involve state-controlled entities or Yes			100
38 a If N, provide the date when the last ABC EWRA was completed.  39 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 a Potential liability created by intermediaries and other third-party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or Yes	38		
completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Potential liability created by intermediaries and other third-party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  Transactions, products or services, including those that involve state-owned or state-controlled entities or Yes		(EVVKA) been completed in the last 12 months?	Yes
completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Potential liability created by intermediaries and other third-party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  Transactions, products or services, including those that involve state-owned or state-controlled entities or Yes	20 6	If N. provide the data when the last ADC EMDA	
39 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 a Potential liability created by intermediaries and other third-party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or Yes	30 d	The state of the s	
the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 a Potential liability created by intermediaries and other third-party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-controlled entities or			
the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 a Potential liability created by intermediaries and other third-party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-controlled entities or			
the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 a Potential liability created by intermediaries and other third-party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-controlled entities or	39	Does the Entity have an ABC residual risk rating that is	
Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 a Potential liability created by intermediaries and other third-party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-controlled entities or			Yes
components detailed below:  40 a Potential liability created by intermediaries and other third-party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or			
40 a Potential liability created by intermediaries and other third-party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or	40		
third-party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or Yes	40 a		
40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-controlled entities or Yes			Yes
through intermediaries  40 c Transactions, products or services, including those that involve state-controlled entities or Yes	40 b	Corruption risks associated with the countries and	
40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or Yes			Yes
that involve state-owned or state-controlled entities or Yes	40 c		
	70 0		Yes

40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
	2nd Line of Defence	Yes
42 c	3rd Line of Defence	Yes
42 d		165
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
42 f	Non-employed workers as appropriate (contractors/consultants)	Yes
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
5. AML, (	CTF & SANCTIONS POLICIES & PROCEDURES  Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent,	
46 a	detect and report:  Money laundering	Yes
46 b	Terrorist financing	Yes
46 C	Sanctions violations	Yes
	Are the Entity's policies and procedures updated at least	Tes
47	annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	Yes
48 a1	If Y, does the Entity retain a record of the results?	Yes
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	Yes
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 c	Prohibit dealing with other entities that provide banking	Yes
40.4	services to unlicensed banks	T-0.0.57
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	

49 i	Define the process for escalating financial crime risk	
	issues/potentially suspicious activity identified by	Yes
	employees	165
40 :		
49 j	Define the process, where appropriate, for terminating	
	existing customer relationships due to financial crime	Yes
	risk	
49 k	Define the process for exiting clients for financial	
	crime reasons that applies across the entity, including	Vas
		res
40.1	foreign branches and affiliates	
49 1	Define the process and controls to identify and handle	
	customers that were previously exited for financial	Yes
	crime reasons if they seek to re-establish a	res
	relationship	
49 m	Outline the processes regarding screening for	
	sanctions, PEPs and Adverse Media/Negative News	Yes
	sanctions, FEF's and Adverse Media/Negative News	
49 n	Outline the processes for the maintenance of internal	
	"watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or	
	similar document which defines a risk boundary around	Yes
		res
	their business?	
51	Does the Entity have record retention procedures that	Yes
	comply with applicable laws?	1.55
51 a	If Y, what is the retention period?	
		5 years or more
52	Confirm that all responses provided in the above Section	
32	are representative of all the LE's branches	Yes
FO -		
52 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
	If appropriate, provide any additional information/context	
53		
53		
53	to the answers in this section.	to what
53		To adding the second se
53		
	to the answers in this section.	To restrict to
	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT	
6. AML, C	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent	
6. AML, C	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Yes
6. AML, C 54	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client	Yes
6. AML, C 54 54 a 54 b	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product	Yes
6. AML, C 54	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client	Yes Yes
6. AML, C 54 54 a 54 b	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product	Yes
6. AML, C 54 54 a 54 b 54 c 54 d	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography	Yes Yes
6. AML, C 54 54 a 54 b 54 c	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls	Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 d	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring	Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence	Yes Yes Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring	Yes Yes Yes
6. AML, C 54  54 a 54 b 54 c 54 d 55  55 a 55 b 55 c	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification	Yes Yes Yes Yes Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 a 55 b 55 c 55 d	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	Yes
6. AML, C 54  54 a 54 b 54 c 54 d 55  55 a 55 b 55 c	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative	Yes Yes Yes Yes Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 65 a 655 b 55 c 555 d 556	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes
6. AML, C 54  54 a 54 b 54 c 54 d 55  55 a 55 b 55 c 55 d 55 e	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News  Training and Education	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 65 a 55 b 55 c 55 d 55 e	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes
6. AML, C 54  54 a 54 b 54 c 54 d 55  55 a 55 b 55 c 55 d 55 e	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News  Training and Education	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 65 a 55 b 55 c 55 d 55 e	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	Yes
6. AML, C 54  54 a 54 b 54 c 54 d 55  55 a 55 b 55 c 55 d 55 e	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 65 a 55 b 55 c 55 d 55 e	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 56 g 56 h 56	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 56 g 56 h 56	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 65 a 55 b 655 c 55 d 55 e  55 f 55 g 55 h 56	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 56 g 56 h 56	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 65 a 55 b 655 c 55 d 55 e  55 f 55 g 55 h 56	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 c 55 d 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 c 55 d 55 e  55 f 55 g 55 h 56 56 a	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e  55 f 55 g 55 h 56  56 a	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 c 55 d 55 e  55 f 55 g 55 h 56 56 a	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 65 a 55 b 55 c 55 d 55 b 55 c 55 f 65 a 56 a	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e  55 f 55 g 55 h 56  56 a	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e  55 f 55 g 55 h 56 56 a	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e  55 f 55 g 55 h 56  57 a 57 b 57 c 57 d 58 58 a	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 65 a 55 b 55 c 55 d 55 e 55 f 65 g 55 h 56 56 a  57 a 57 b 57 c 57 d 58 58 a 58 b	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e  55 f 55 g 55 h 56  57 a 57 b 57 c 57 d 58 58 a	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 65 a 55 b 55 c 55 d 55 e 55 f 65 g 55 h 56 56 a  57 a 57 b 57 c 57 d 58 58 a 58 b	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes

50	Name Corcoping	Yes
58 e	Name Screening Transaction Screening	Yes
58 f	Training and Education	Yes
58 g 59	Has the Entity's Sanctions EWRA been completed in the	Yes
	last 12 months?	103
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context to the answers in this section.	
7. KYC, (	CDD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure Product usage	Yes Yes
64 e 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 Other relevant parties	Yes
65 d 66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	Yes Other (5%)
67	Does the due diligence process result in customers receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information Other (specify)	Yes
J/ 40	Onter (apacity)	Sanction relevance, PEP status, country risk
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes
68 a	If Y, is this at:	。 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4		No
68 a4a	If yes, please specify "Other"	
69		Yes
69 a	If Y, is this at:	
69 a 69 a1 69 a2	Onboarding	Yes Yes

What is the method used by the Entity is screen for Adverte Media/Nagalite Version (Adverte	00 -0	Triange	
Adverse Media/Negative News?    Does the Entity News an Extension of the Section	69 a3	Trigger event	Yes
Covers to Entity search as a content of processes of the	70		Manual
Customer and connected parties to determine whether they are EPE, or controlled by PEEPs?  71 at 1	71		
Table   Tabl	, ,	customers and connected parties to determine whether	Voc
Ti ad Choboarding Yes  Ti ad Trigger event Yes  The second of the common		they are PEPs, or controlled by PEPs?	165
Til at Chocarding Til 22 With cerewal Yes Til 32 Til 79 What is the method used by the Entity to screen PEPs? What will be the method used by the Entity to screen PEPs? What will be the Child have policios, procedures and processes to review and escalate potential matches from cerewing outstomers and connected parties to determine whether they are PEPs. or controlled by PEPs?  Til 3 SYCT renewed at defined frequencies based on risk rating (Perdoic Reversely) Til 4 SYCT renewed at defined frequencies based on risk rating (Perdoic Reversely) Til 5 SYCT renewed at defined frequencies based on risk rating (Perdoic Reversely) Til 5 SYCT renewed at defined frequencies based on risk rating (Perdoic Reversely) Til 5 SYCT renewed at defined frequencies based on risk rating (Perdoic Reversely) Til 5 SYCT renewed at defined frequencies based on risk rating (Perdoic Reversely) Til 5 SYCT renewed at defined frequencies based on risk rating (Perdoic Reversely) Til 5 SYCT renewed at defined frequencies based on risk rating (Perdoic Reversely) Til 5 SYCT renewed at defined frequencies based on risk rating (Perdoic Reversely) Til 5 SYCT renewed at defined frequencies based on risk rating (Perdoic Reversely) Til 5 SYCT renewed at defined frequencies based on risk rating (Perdoic Reversely) Til 5 SYCT renewed at defined frequencies based on risk rating (Perdoic Reversely) Til 5 SYCT renewed at defined requencies based on risk rating (Perdoic Reversely) Til 5 SYCT renewed at defined requencies based on risk rating (Perdoic Reversely) Til 5 SYCT renewed at defined requencies based on risk rating (Perdoic Reversely) Til 5 SYCT renewed at defined requencies of current and renewed frequencies renewed	71 a	If Y, is this at:	
Til ab Trigger event ( proper by the Entity to screen PEPs 7  What is the method used by the Entity to screen PEPs 7  What is the method used by the Entity to screen PEPs 7  Amount of the Entity have policies, procedures and processes on the Entity have policies, procedures and proceed parties to delemine whether they are PEPs, controlled by PEPs 7  I all processes and connected frequencies based on risk whether they are PEPs, controlled by PEPs 7  I all processes and connected frequencies based on risk 1 and processes 1 and processes 1 and processes 1 and processes 2 and processes 3			Yes
71 a. What is the method used by the Entity to screen PEPs?  72 What is the method used by the Entity to screen PEPs?  73 Does the Entity have policies, procedures and processes to review and excelled potential marketes from screening they are PEPs, or controlled by PEPs?  74 Is YY renewed at definite frequencies based on risk rating (Periodic Reviews)?  75 Is a Single Periodic Reviews)?  76 Is a Single Periodic Reviews)?  77 Does the Entity have policies, procedures and processes to review and excelled programs and they reviews and excelled processes to review and excelled programs and they reviews and excelled processes to review and past periodic or representation of the processes of the pro			
73 Does the Entity have policies, procedures and processes to review and excelete potential matches from crossing to review and excelete potential matches from crossing they are PEPs, or controlled by PEPs?  74 Is YVC renewed at defined frequencies based on risk and the processes of the process	71 a3	Trigger event	
Does the Entity have policies, procedures and processes to the review and escalating precision affects from tracering customers and connected parties to determine whether they are PEPs, or controlled by PEPs?  1	72	What is the method used by the Entity to screen PEPs?	Manual
ustromers and connected parties to determine whether they are PEPs, or controlled by PEPs?  74. Is KYC moneved all defined frequencies based on risk rating (Periodic Reviews)?  74. a. If yes, select all that popy;  74. a. If yes and yes are yes an expenditual monitoring reviews  74. a. If yes an expenditual monitoring reviews  75. a. Cherry (Plaste specify)  76. a. Cherry (Plaste specify)  77. b. Respondent Barris  78. c. Embassies Consultate  78. c. Embassies Consultate  78. d. Embassies Consultate  78. d. Embassies Consultate  78. d. Embassies Consultates  78. d. Em	73	Does the Entity have policies procedures and processes	
customers and connected parties to determine whether they are PEPs, or controlled by PEPs?  74. a 1. KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?  74. a 1. Exes than one year			
they are PEPs, or controlled by PEPs?  14 a		customers and connected parties to determine whether	Yes
rating (Periodic Reviews)?  74. at   If yes, select all that apply.  74. at   Less than one year   Yes    74. at   1 - 2 years   Yes    74. at   3 - 4 years   Yes    74. at   3 - 3 - 4 years   Yes    74. at   5 - 2 years   Yes    75.   Ohse (Please specify)    76.   Does the Entity maintain and report metrics on current and past periodic or brigger event due diligence eviews?  77.   From the list below, which categories of customers or industries are subject to EDD andro are restricted, or prohibited    78.   Arms. defence, military   Prohibited    78.   Arms. defence, military   Prohibited    78.   Promise   Prohibited    78.   Prohibited   Prohibited    78.   Comment   Prohibited    79.   Comment   Prohibited    79.   Comment   Prohibited    79.   Comment   Prohibited    79.   Prohibited    80.   Prohib		they are PEPs, or controlled by PEPs?	
rating (Percodic Reviews)?  74 al   Fyes, select all that pagy. 74 al   Less than one year   Yes   74 a2   1 - 2 years   Yes   74 a3   3 - 4 years   Yes   74 a4   5 - 2 years   Yes   75   South of the properties of the propertie	74	Is KYC renewed at defined frequencies based on risk	
Less than one year			Yes
Table   1 - 2 years	74 a	If yes, select all that apply:	
74 a4			Yes
74 a6 Syears or more Other (Please specify)  75 Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?  76 From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?  76 a Arms, defence, military Pholibited  78 b Repondent Banks  78 b Repondent Banks  78 b Repondent Banks  78 b Repondent Banks  79 correspondent Banks  70 corresponden			
Tale 5   Trigger-based or perpetual monitoring reviews   Yes    Other (Please specify)   Cher (Please specify)    To Cher			
76 Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews? 76 From the list below, which adegories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme? 78 a Arms, defence, military 78 b Respondent Banking 78 b Respondent Banking 78 b Correspondent Banking Principles 2022? 78 c Embassies/Consultates 78 c Non-Government Organisations 78 c Non-Government Organisations 79 c Pool on risk-based approach 79 c Pool on risk-based app			No
75 Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews? 76 From the list below, which categories of customers or industries are subject to EDD andre are restricted, or prohibited by the Entity's FCC programme? 78 A. Arms, defence, military 78 b. Respondent Banks Description of the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? 78 c. Embassies/Consultates 78 b. Tespondent Banking Principles 2022? 78 c. Embassies/Consultates 79 c. Governal Trading Companies 79 c. Generial Trading Companies 79 c. Generial Trading Companies 79 c. Generial Trading Companies 79 c. Governal Trading Companies 70 c. Embassies/Consultates 70 c. Embassies/Consultates 71 c. Generial Trading Companies 72 c. Governal Trading Companies 73 c. Governal Trading Companies 74 c. Mon-Government Organisations 75 c. Do no Insk-based approach 76 c. Governal Trading Companies 76 c. Governal Trading Companies 76 c. Governal Trading Companies 77 c. Governal Trading Companies 78 c. Mon-Government Organisations 78 c. Do no Insk-based approach 79 c. Companies 79			Yes
and past periodic or trigger event due diligence reviews?  Form the list below, which categories of customers or industries are subject to EDD andro are restricted, or prohibited by the Entity's FCC programme?  Fa B Respondent Banks  The bit of the stricted, does the EDD assessment confain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Fa C Embassies/Consulates  Fa G Extractive industries  EDD on risk-based approach  Fa G General Trading Companies  Fa G General Trading Companies  Fa G Manijuan-arelated Entities  Prohibited  Do not have this category of customer or industry  EDD on risk-based approach  Fa G General Trading Companies  EDD on risk-based approach  Fa G Manijuan-arelated Entities  Prohibited  Do not have this category of customer or industry  Fa G Manijuan-arelated Entities  Prohibited  Do not have this category of customer or industry  Fa G Manijuan-arelated Entities  Prohibited  Do not have this category of customer or industry  Fa G Manijuan-arelated Entities  Prohibited  Do not have this category of customer or industry  Fa G Manijuan-arelated Entities  Prohibited  Do not have been approach  Fa Non-account customers  Do not have this category of customer or industry  Do not have the category of customer or industry  Do not have the category of customer or industry  Do not have the category of customer or industry  Do not have been approach  Do not have been approach  EDD on risk-based approach  Do not have been approach  EDD on risk-based approach  Do not have been approach  Do not have been approach  Prohibited  EDD on risk-based approach  Prohibited  EDD on risk-based approach  Prohibited  EDD on risk-based approach  Prohibited  Do not risk-based approach  Prohibited  EDD on risk-based approach  Prohibited  EDD on risk-based approach  Prohibited  Do not risk-based approach  Prohibited  Do not risk-based approach  Prohibited  Do not risk-based approach  Do not risk-based approach  Prohibited  Do not risk-based approach  Prohibited  Do not risk-based approach  D	74 a6	Other (Please specify)	
and past periodic or trigger event due diligence reviews?  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?  Fa A Tems, defence, military  Fa B Respondent Banks  On the New this category of customer or industry  Fa B Respondent Banks  On the New this category of customer or industry  Fa B Respondent Banks  On the New this category of customer or industry  Fa B Respondent Banks  On the New this category of customer or industry  Fa B Respondent Banks  Do not have this category of customer or industry  Fa B Respondent Banks  Do not have this category of customer or industry  Fa B Respondent Banking Principles 2022  Fa B Extractive industries  EDD on risk-based approach  Fa B Respondent Banking Principles 2022  Fa B Extractive industries  EDD on risk-based approach  Fa B Respondent Banking Principles 2022  Fa B Marginan-related Entities  Prohibited  Prohibited  Prohibited  Do not have this category of customer or industry  Fa B Marginan-related Entities  Prohibited  Prohibited  Do not have this category of customer or industry  Fa B Non-account customers  EDD on risk-based approach  Fa B Non-account customers  EDD on risk-based approach  Fa B Per B ED Response (EDD on risk-based approach  Fa B Per B ED Response (EDD on risk-based approach  Fa B Response (EDD on risk-base			
and past periodic or trigger event due diligence reviews?  Form the list below, which categories of customers or industries are subject to EDD andro are restricted, or prohibited by the Entity's FCC programme?  Fa B Respondent Banks  The bit of the stricted, does the EDD assessment confain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Fa C Embassies/Consulates  Fa G Extractive industries  EDD on risk-based approach  Fa G General Trading Companies  Fa G General Trading Companies  Fa G Manijuan-arelated Entities  Prohibited  Do not have this category of customer or industry  EDD on risk-based approach  Fa G General Trading Companies  EDD on risk-based approach  Fa G Manijuan-arelated Entities  Prohibited  Do not have this category of customer or industry  Fa G Manijuan-arelated Entities  Prohibited  Do not have this category of customer or industry  Fa G Manijuan-arelated Entities  Prohibited  Do not have this category of customer or industry  Fa G Manijuan-arelated Entities  Prohibited  Do not have this category of customer or industry  Fa G Manijuan-arelated Entities  Prohibited  Do not have been approach  Fa Non-account customers  Do not have this category of customer or industry  Do not have the category of customer or industry  Do not have the category of customer or industry  Do not have the category of customer or industry  Do not have been approach  Do not have been approach  EDD on risk-based approach  Do not have been approach  EDD on risk-based approach  Do not have been approach  Do not have been approach  Prohibited  EDD on risk-based approach  Prohibited  EDD on risk-based approach  Prohibited  EDD on risk-based approach  Prohibited  Do not risk-based approach  Prohibited  EDD on risk-based approach  Prohibited  EDD on risk-based approach  Prohibited  Do not risk-based approach  Prohibited  Do not risk-based approach  Prohibited  Do not risk-based approach  Do not risk-based approach  Prohibited  Do not risk-based approach  Prohibited  Do not risk-based approach  D			
and past periodic or trigger event due diligence reviews?  Form the list below, which categories of customers or industries are subject to EDD andro are restricted, or prohibited by the Entity's FCC programme?  Fa B Respondent Banks  The bit of the stricted, does the EDD assessment confain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Fa C Embassies/Consulates  Fa G Extractive industries  EDD on risk-based approach  Fa G General Trading Companies  Fa G General Trading Companies  Fa G Manijuan-arelated Entities  Prohibited  Do not have this category of customer or industry  EDD on risk-based approach  Fa G General Trading Companies  EDD on risk-based approach  Fa G Manijuan-arelated Entities  Prohibited  Do not have this category of customer or industry  Fa G Manijuan-arelated Entities  Prohibited  Do not have this category of customer or industry  Fa G Manijuan-arelated Entities  Prohibited  Do not have this category of customer or industry  Fa G Manijuan-arelated Entities  Prohibited  Do not have this category of customer or industry  Fa G Manijuan-arelated Entities  Prohibited  Do not have been approach  Fa Non-account customers  Do not have this category of customer or industry  Do not have the category of customer or industry  Do not have the category of customer or industry  Do not have the category of customer or industry  Do not have been approach  Do not have been approach  EDD on risk-based approach  Do not have been approach  EDD on risk-based approach  Do not have been approach  Do not have been approach  Prohibited  EDD on risk-based approach  Prohibited  EDD on risk-based approach  Prohibited  EDD on risk-based approach  Prohibited  Do not risk-based approach  Prohibited  EDD on risk-based approach  Prohibited  EDD on risk-based approach  Prohibited  Do not risk-based approach  Prohibited  Do not risk-based approach  Prohibited  Do not risk-based approach  Do not risk-based approach  Prohibited  Do not risk-based approach  Prohibited  Do not risk-based approach  D			
and past periodic or trigger event due diligence reviews?  Form the list below, which categories of customers or industries are subject to EDD andro are restricted, or prohibited by the Entity's FCC programme?  Fa B Respondent Banks  The bit of the stricted, does the EDD assessment confain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Fa C Embassies/Consulates  Fa G Extractive industries  EDD on risk-based approach  Fa G General Trading Companies  Fa G General Trading Companies  Fa G Manijuan-arelated Entities  Prohibited  Do not have this category of customer or industry  EDD on risk-based approach  Fa G General Trading Companies  EDD on risk-based approach  Fa G Manijuan-arelated Entities  Prohibited  Do not have this category of customer or industry  Fa G Manijuan-arelated Entities  Prohibited  Do not have this category of customer or industry  Fa G Manijuan-arelated Entities  Prohibited  Do not have this category of customer or industry  Fa G Manijuan-arelated Entities  Prohibited  Do not have this category of customer or industry  Fa G Manijuan-arelated Entities  Prohibited  Do not have been approach  Fa Non-account customers  Do not have this category of customer or industry  Do not have the category of customer or industry  Do not have the category of customer or industry  Do not have the category of customer or industry  Do not have been approach  Do not have been approach  EDD on risk-based approach  Do not have been approach  EDD on risk-based approach  Do not have been approach  Do not have been approach  Prohibited  EDD on risk-based approach  Prohibited  EDD on risk-based approach  Prohibited  EDD on risk-based approach  Prohibited  Do not risk-based approach  Prohibited  EDD on risk-based approach  Prohibited  EDD on risk-based approach  Prohibited  Do not risk-based approach  Prohibited  Do not risk-based approach  Prohibited  Do not risk-based approach  Do not risk-based approach  Prohibited  Do not risk-based approach  Prohibited  Do not risk-based approach  D	75	Does the Entity maintain and report metrics on current	
Form 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  77 b B Respondent Banks  78 b Respondent Banks  78 b Respondent Banks  78 b Respondent Banks  78 correspondent Banks  79 correspondent Banking Principles 2022?  78 c Embassies/Consulates  79 correspondent Banking Principles 2022?  78 c Embassies/Consulates  78 d Extractive industries  78 d Extractive industries  78 d Gambling customers  79 chibited  79 ceneral Trading Companies  FDD on risk-based approach  79 ceneral Trading Companies  FDD on risk-based approach  79 ceneral Trading Companies  FDD on risk-based approach  79 customers  70 non-favorement Organisations  FDD on risk-based approach  70 non-favorement Organisations  FDD on risk-based approach  70 non-favorement Organisations  FDD on risk-based approach  70 non-resident customers  FDD on risk-based approach  FDD on ris	75		Vac
ridustries 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  76 b Respondent Banks  76 b Respondent Banks  76 b Respondent Banks  76 correspondent Banking Principles 2022?  77 correspondent Banking Principles 2022?  78 c Embassies/Consulates  78 c Embassies/Consulates  78 c Embassies/Consulates  78 c Gambling customers  79 chibited  79 coners Indiand Companies  79 chibited  79 coners Indiand Companies  79 chibited  79 con risk-based approach  70 con risk-based approach  70 con risk-based approach  71 con risk-based approach  72 con risk-based approach  73 con risk-based approach  74 con risk-based approach  75 con risk-based approach  76 con risk-based approach  77 con risk-based approach  78 con risk-based approach  78 con risk-based approach  79 con risk-b		and past periodic of trigger event due diligence reviews:	
ridustries 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  76 b Respondent Banks  76 b Respondent Banks  76 b Respondent Banks  76 correspondent Banking Principles 2022?  77 correspondent Banking Principles 2022?  78 c Embassies/Consulates  78 c Embassies/Consulates  78 c Embassies/Consulates  78 c Gambling customers  79 chibited  79 coners Indiand Companies  79 chibited  79 coners Indiand Companies  79 chibited  79 con risk-based approach  70 con risk-based approach  70 con risk-based approach  71 con risk-based approach  72 con risk-based approach  73 con risk-based approach  74 con risk-based approach  75 con risk-based approach  76 con risk-based approach  77 con risk-based approach  78 con risk-based approach  78 con risk-based approach  79 con risk-b	76	From the list below, which categories of customers or	校会的意思,我们就是我们的现在分词来是没有的。"
prohibited by the Entity's FCC programme?  76 a Arms, defence, military Prohibited  76 b Respondent Banks Do not have this category of customer or industry  76 b Respondent Banks Do not have this category of customer or industry  76 c Embassies/Consulates EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  76 c Embassies/Consulates EDD on risk-based approach  76 c Embassies/Consulates EDD on risk-based approach  76 d Gambling customers Prohibited  76 d General Trading Companies EDD on risk-based approach  76 h MSB/MVTS customers EDD on risk-based approach  77 h MSB/MVTS customers Do not have this category of customer or industry  78 i Non-account customers Do not have this category of customer or industry  78 i Non-Government Organisations EDD on risk-based approach  78 k Non-resident customers EDD on risk-based approach  78 k Non-resident customers EDD on risk-based approach  78 k Non-resident customers EDD on risk-based approach  78 n PEPS EDD on risk-based approach  78 n PEPS EDD on risk-based approach  78 n PEPS EDD on risk-based approach  78 n PEP Related EDD on risk-based approach  78 n Regigited charities EDD on risk-based approach  78 n Non-Bernstein EDD on risk-based approach  78 n Regigited charities EDD on risk-based approach  79 n Regigited charities E	70		[1] 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.
76 a   Arms, defence, military   Prohibited   Do not have this category of customer or industry		The state of the s	
76 b			
If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?   Rembassies/Consulates   EDD on risk-based approach		The state of the s	Prohibited
contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  76 c Embassies/Consulates EDD on risk-based approach 76 d Extractive industries EDD on risk-based approach 76 e Gambling ustomers Prohibited 76 f General Trading Companies EDD on risk-based approach 76 g Marijuana-related Entities Prohibited 76 h MSB/MVTS customers EDD on risk-based approach 76 h MSB/MVTS customers EDD on risk-based approach 76 i Non-account customers Do not have this category of customer or industry 76 l Non-accountment Organisations EDD on risk-based approach 76 l Non-resident customers EDD on risk-based approach 76 l Nuclear power EDD on risk-based approach 76 n Peyrent Service Providers EDD on risk-based approach 76 n Peyre Related EDD on risk-based approach 76 n Red light businesses/Adult entertainment Prohibited 76 n Red light businesses/Adult entertainment Prohibited 76 n Red service Providers EDD on risk-based approach 76 n Red light businesses/Adult entertainment Prohibited 76 n Red light businesses/Adult entertainment EDD on risk-based approach 76 n Red light businesses/Adult entertainment EDD on risk-based approach 76 n Red light businesses/Adult entertainment EDD on risk-based approach 76 n Red light businesses/Adult entertainment EDD on risk-based approach 76 n Red light businesses/Adult entertainment EDD on risk-based approach 76 n Red light businesses/Adult entertainment EDD on risk-based approach 76 n Red light businesses/Adult entertainment EDD on risk-based approach 76 n Red light businesses/Adult entertainment EDD on risk-based approach 76 n Red light businesses/Adult entertainment EDD on risk-based approach 76 n Red light businesses/Adult entertainment EDD on risk-based approach 76 n Red light businesses/Adult entertainment EDD on risk-base			Do not have this category of customer or industry
Correspondent Banking Principles 2022?  76 c Embassies/Consulates	76 b1	If EDD or restricted, does the EDD assessment	
Total			
Extractive industries			
Frohibited   General Trading Companies   EDD on risk-based approach			
Test   General Trading Companies   EDD on risk-based approach			
Marijuana-related Entities			
MSB/MVTS customers			
Non-account customers			
76   Non-Government Organisations   EDD on risk-based approach			
76 k   Non-resident customers   EDD on risk-based approach			
76   Nuclear power   EDD on risk-based approach			
Payment Service Providers			
PEPs			
PEP Close Associates   EDD on risk-based approach			
PEP Related			
Precious metals and stones			
Red light businesses/Adult entertainment			
Regulated charities   EDD on risk-based approach			
Travel and Tour Companies   EDD on risk-based approach			
76 u Travel and Tour Companies EDD on risk-based approach 76 v Unregulated charities EDD on risk-based approach 76 w Used Car Dealers EDD on risk-based approach 76 x Virtual Asset Service Providers EDD on risk-based approach 76 y Other (specify)  77 If restricted, provide details of the restriction  Each deal and counterparty are carefully examined and only those approved where the encountered risks can mitigated. Compliance conducts EDD in every case, taking into consideration all the possible risks generated by the characteristics of the industries and counterparties.  78 Does EDD require senior business management and/or			
76 v     Unregulated charities     EDD on risk-based approach       76 w     Used Car Dealers     EDD on risk-based approach       76 x     Virtual Asset Service Providers     EDD on risk-based approach       76 y     Other (specify)       77     If restricted, provide details of the restriction     Each deal and counterparty are carefully examined and only those approved where the encountered risks can mitigated. Compliance conducts EDD in every case, taking into consideration all the possible risks generated by the characteristics of the industries and counterparties.       78     Does EDD require senior business management and/or			
Testricted, provide details of the restriction   Each deal and counterparty are carefully examined and only those approved where the encountered risks can mitigated. Compliance conducts EDD in every case, taking into consideration all the possible risks generated by the characteristics of the industries and counterparties.			
76 x Virtual Asset Service Providers EDD on risk-based approach  77 If restricted, provide details of the restriction  Each deal and counterparty are carefully examined and only those approved where the encountered risks can mitigated. Compliance conducts EDD in every case, taking into consideration all the possible risks generated by the characteristics of the industries and counterparties.  78 Does EDD require senior business management and/or			
77 Other (specify)  Each deal and counterparty are carefully examined and only those approved where the encountered risks can mitigated. Compliance conducts EDD in every case, taking into consideration all the possible risks generated by the characteristics of the industries and counterparties.  78 Does EDD require senior business management and/or			
77 If restricted, provide details of the restriction  Each deal and counterparty are carefully examined and only those approved where the encountered risks can mitigated. Compliance conducts EDD in every case, taking into consideration all the possible risks generated by the characteristics of the industries and counterparties.  78 Does EDD require senior business management and/or			EDD on risk-based approach
Each deal and counterparty are carefully examined and only those approved where the encountered risks can mitigated. Compliance conducts EDD in every case, taking into consideration all the possible risks generated by the characteristics of the industries and counterparties.  78 Does EDD require senior business management and/or	76 y	Other (specify)	
mitigated. Compliance conducts EDD in every case, taking into consideration all the possible risks generated be the characteristics of the industries and counterparties.  78 Does EDD require senior business management and/or	77	If restricted, provide details of the restriction	
			mitigated. Compliance conducts EDD in every case, taking into consideration all the possible risks generated by
	78	Does FDD require senior business management and/or	

78 a	If Y indicate who provides the approval:	Compliance
79	Does the Entity have specific procedures for onboarding	
	entities that handle client money such as lawyers,	Yes
	accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or quality	V
	review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section	V
	are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
	published with the action to the published of the transport of the control of the	
82	If appropriate, provide any additional information/context	
	to the answers in this section.	
8 MONIT	FORING & REPORTING	
83	Does the Entity have risk based policies, procedures and	
63		Von
	monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor	
04	transactions for suspicious activities?	Manual
84 a	If manual or combination selected, specify what type	
04 a	of transactions are monitored manually	
	of transactions are monitored manually	All lending deals
84 b	If automated or combination selected, are internal	
	system or vendor-sourced tools used?	
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is	
	the name of the vendor/tool?	
04 50	M/hon was the tool lest undeted?	
84 b2	When was the tool last updated?	<1 year
84 b3	When was the automated Transaction Monitoring	< 1 year
	application last calibrated?	1 year
85	Does the Entity have regulatory requirements to report	No
	suspicious transactions?	140
85 a	If Y, does the Entity have policies, procedures and	
	processes to comply with suspicious transaction	
	reporting requirements?	
86	Does the Entity have policies, procedures and processes	
	to review and escalate matters arising from the	Yes
	monitoring of customer transactions and activity?	7.7
87	Does the Entity have a data quality management	
	programme to ensure that complete data for all	Yes
	transactions are subject to monitoring?	
88	Does the Entity have processes in place to respond to	
	Request For Information (RFIs) from other entities in a	Yes
	timely manner?	
89	Does the Entity have processes in place to send	
	Requests for Information (RFIs) to their customers in a	Yes
	timely manner?	
90	Confirm that all responses provided in the above Section	Yes
2	are representative of all the LE's branches	162
90 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
01	If appropriate provide any additional information ( )	
91	If appropriate, provide any additional information/context	
	to the answers in this section.	85 - not applicable
		oo - not applicable
9 PAYME	ENT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment	
	Transparency Standards?	Yes
	The state of the s	

02	Door the Estitute and Indian	
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	2000年1月1日 - 1000年1月1日 - 1000年1日
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	Yes
33 51	ii 1, specify the regulation	Although IIB is not subject to any local regulations, the bank avoids any breaches in the laws of the countries of operation and business activity.
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	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	Yes
	are representative of all the LE's branches	Tes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC	TIONS	
98	Does the Entity have a Sanctions Policy approved by	
	management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	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?	Manual
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 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?	Manual
105	Does the Entity have a data quality management	
	programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data

106 b	United States Department of the Treasury's Office of	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Foreign Assets Control (OFAC) Office of Financial Sanctions Implementation HMT	Osed for screening customers and periencial owners and for intering transactional data
1.5.5.5.	(OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Not used
106 f	Other (specify)	Member states sanction lists
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	
11. TRAIN	IING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	No
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to :	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
112 f	Non-employed workers (contractors/consultants)	Yes
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
114		
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
	and Sanctions staff?	Yes
114 a 115		Yes Annually 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.	
		111-a not applicable
	Y ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from	Yes
	the independent Audit function)?	
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the	V
	independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section	Yes
119 a	are representative of all the LE's branches  If N, clarify which questions the difference/s relate to	
110 u	and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
	to the answers in this section.	
13. AUDIT		
121	In addition to inspections by the government	
	supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent	
	third party, or both, that assesses FCC AML, CTF, ABC,	Yes
	Fraud and Sanctions policies and practices on a regular	
122	basis?  How often is the Entity audited on its AML, CTF, ABC.	
122	Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party  Does the internal audit function or other independent third	Yearly
123	party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and	Yes
123 b	procedures Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e 123 f	Name Screening & List Management Reporting/Metrics & Management Information	Yes Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i 123 j	Transaction Monitoring Transaction Screening including for sanctions	Yes Yes
123 k	Training & Education	Yes
123 I	Other (specify)	
124	Are adverse findings from internal & external audit	
	tracked to completion and assessed for adequacy and	Yes
105	completeness?  Confirm that all responses provided in the above section	
125	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	
120	to the answers in this section.	
14. FRAU		
407	Does the Entity have policies in place addressing fraud	V
127		Yes
128	risk?  Does the Entity have a dedicated team responsible for	Yes

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

## **Declaration Statement**

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

International Investment Bank (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, Potapov Georgy Nugzarovich (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, Gruzinov Grigory (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 Finencial institution.

26.04.2024

(Signature & Date)

(Signat

Est. 1910 ONAL INVES re & Date)

26.04.2024

© The Wolfsberg Group 2023