

Financial Institution Name:	
Location (Country) :	

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	
2	Append a list of foreign branches which are covered	
	by this questionnaire	
3	Full Legal (Registered) Address	
	Tuli Legal (Negistered) Address	
4	Edi Disease Projects Address (15 different form	
4	Full Primary Business Address (if different from above)	
	above)	
5	Date of Entity incorporation/establishment	
6	Select type of ownership and append an ownership	
	chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	
6 b	Member Owned/Mutual	
6 c	Government or State Owned by 25% or more	
6 d	Privately Owned	
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	
	_	
7	% of the Entity's total shares composed of bearer	
	shares	
8	Does the Entity, or any of its branches, operate under	
0	an Offshore Banking License (OBL)?	
8 a	If Y, provide the name of the relevant branch/es	
u a	which operate under an OBL	
	Dage the Dealth are a Vinter Bould Comme	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	
40		
10	Name of primary financial regulator/supervisory	
	authority	
11	Provide Legal Entity Identifier (LEI) if available	
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	
	<u>l</u>	L

13	Jurisdiction of licensing authority and regulator of	
	ultimate parent	
14	Select the business areas applicable to the Entity	
14 a		
	Retail Banking	
14 b	Private Banking	
14 c	Commercial Banking	
14 d	Transactional Banking	
14 e	Investment Banking	
	· ·	
14 f	Financial Markets Trading	
14 g	Securities Services/Custody	
14 h	Broker/Dealer	
14 i	Multilateral Development Bank	
14 j	Wealth Management	
14 k	Other (please explain)	
15	Does the Entity have a significant (10% or more)	
	portfolio of non-resident customers or does it derive	
	more than 10% of its revenue from non-resident	
	customers? (Non-resident means customers primarily	
	resident in a different jurisdiction to the location	
	where bank services are provided)	
	micro bank corridos are provided)	
15 a	If Y, provide the top five countries where the non-	
1	resident customers are located.	
	Toolgoni ousiomers are rocated.	
16	Select the closest value:	
16 a		
	Number of employees	
16 b	Total Assets	
17	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches.	
17 a	If N, clarify which questions the difference/s relate to	
11 a		
	and the branch/es that this applies to.	
18	If appropriate, provide any additional	
1.0	information/context to the answers in this section.	
	information/context to the answers in this section.	
2 PPODIT	CTS & SERVICES	
19	Does the Entity offer the following products and	
	services:	
19 a	Correspondent Banking	
19 a1	IfY	
19 a1a	Does the Entity offer Correspondent Banking	
13 4 14		
	services to domestic banks?	
19 a1b	Does the Entity allow domestic bank clients to	
	provide downstream relationships?	
19 a1c	Does the Entity have processes and procedures	
1.5 4.10	in place to identify downstream relationships with	
	domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking	
	services to foreign banks?	
19 a1e	Does the Entity allow downstream relationships	
1.2 2.0	with foreign banks?	
40 . 45	9	
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	
isaiy		
	services to regulated Money Services Businesses	
L	(MSBs)/Money Value Transfer Services (MVTSs)?	
19 a1h	Does the Entity allow downstream relationships	
	with MSBs, MVTSs, or Payment Service Provider	
	(PSPs)?	
	, ,	
19 a1h1	MSBs	
19 a1h2	MVTSs	
19 a1h3	PSPs	

19 at Does the Entity have processes and procedures in place to identify downstream relationships with MSBs MVTSsPSPs?
in place to identify downstream relationships with MSBs MVTSsPSPSP 3 19 b Cross-Border Bulk Cash Delivery 19 c Cross-Border Remittances 19 d Domestic Bulk Cash Delivery 19 e Hold Mail 19 f International Cash Letter 19 g Low Price Securities 19 h Payable Through Accounts 19 1 Payment services to non-bank entities who may then offer third party payment services to their customers? 19 if If Y, please select all that apply below? 19 if Y please select all that apply below? 19 if Y, please select all that apply below? 19 if Y, please select all that apply below? 19 if Wirtual Asset Service Providers (VASPs) 19 if Other - Please explain 19 if Other - Please explain 19 if Private Banking 19 private Banking 10 private Banking 10 private Banking 10 priv
MSBs MVTSs/PSPs?
19 b Cross-Border Bulk Cash Delivery 19 c Cross-Border Remittances 19 d Domestic Bulk Cash Delivery 19 e Hold Mail 19 f International Cash Letter 19 g Low Price Securities 19 p Payable Through Accounts 19 i Payment services to non-bank entities who may then offer third party payment services to their customers? 19 if If Y, please select all that apply below? 19 iif Y please select all that apply below? 19 please provider of due diligence 19 pla If yes, state the applicable level of due diligence 19 pla If yes, state the applicable level of due diligence 19 pla If yes, state the applicable level of due diligence 19 pla If yes, state the applicable level of due diligence 19 pla If yes, state the applicable level of due diligence 19 pla If yes, state the applicable level of due diligence 19 plase provide more detail here, including
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19 p4a If yes, state the applicable level of due diligence 19 p5 If you offer other services to walk-in customers please provide more detail here, including
19 p5 If you offer other services to walk-in customers please provide more detail here, including
please provide more detail here, including
describing the level of due diligence.
19 q Other high-risk products and services identified by
the Entity (please specify)
20 Confirm that all responses provided in the above
Section are representative of all the LE's branches.
20 a If N, clarify which questions the difference/s relate to
and the branch/es that this applies to.
and the district approach.
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
22 a Appointed Officer with sufficient experience/expertise 22 b Adverse Information Screening
22 b Adverse Information Screening
22 b Adverse Information Screening 22 c Beneficial Ownership
22 b Adverse Information Screening 22 c Beneficial Ownership 22 d Cash Reporting
22 b Adverse Information Screening 22 c Beneficial Ownership 22 d Cash Reporting 22 e CDD
22 b Adverse Information Screening 22 c Beneficial Ownership 22 d Cash Reporting
22 b Adverse Information Screening 22 c Beneficial Ownership 22 d Cash Reporting 22 e CDD
22 b Adverse Information Screening 22 c Beneficial Ownership 22 d Cash Reporting 22 e CDD 22 f EDD 22 g Independent Testing
22 b Adverse Information Screening 22 c Beneficial Ownership 22 d Cash Reporting 22 e CDD 22 f EDD 22 g Independent Testing 22 h Periodic Review
22 b Adverse Information Screening 22 c Beneficial Ownership 22 d Cash Reporting 22 e CDD 22 f EDD 22 g Independent Testing 22 h Periodic Review 22 i Policies and Procedures
22 b Adverse Information Screening 22 c Beneficial Ownership 22 d Cash Reporting 22 e CDD 22 f EDD 22 g Independent Testing 22 h Periodic Review 22 i Policies and Procedures 22 j PEP Screening
22 b Adverse Information Screening 22 c Beneficial Ownership 22 d Cash Reporting 22 e CDD 22 f EDD 22 g Independent Testing 22 h Periodic Review 22 i Policies and Procedures
22 b Adverse Information Screening 22 c Beneficial Ownership 22 d Cash Reporting 22 e CDD 22 f EDD 22 g Independent Testing 22 h Periodic Review 22 i Policies and Procedures 22 j PEP Screening

22 m Tisnascon Monthling 22 n Tisnascon Monthling 23 n March 17 & Sandons Carlos are in the Entity's 24 March 17 & Sandons Carlos are in the Entity's 24 March 17 & Sandons Carlos are in the Entity's 25 March 17 & Sandons Carlos are in the Entity's 26 In the Entity's AMIL, CTF & Sandons policy approved 27 a In the Entity's AMIL, CTF & Sandons policy approved 28 In the Entity's AMIL, CTF & Sandons Policy approved 29 Does the Extra the Entity are in the AMIL, CTF, A 29 Sandons programma? 29 Does the Entity the Interference and challenge 20 Does the Entity the Interference and challenge 20 Does the Entity the Interference and Carlos are interference 20 Does the Entity the Interference and Carlos are interference 20 Does the Entity the Interference and Carlos are interference 20 Does the Entity the Interference and Carlos are interference 21 a If Y, provide further debals 22 a If Y, provide further debals 23 a If N, Carlos are interference and Entity and Carlos are interference and Carlos are interference and Carlos are interference and Carlos are interferenced and Carlos and Carlos are interferenced and Carlos and Carlos are interferenced and Carlos are interferenced and Carlos are interferenced and Carlos are interferenced and Carlos and Carlos are interferenced and Carlos are interferenced and Carlos are interferenced and Carlos and Carlos are interferenced and Carlos are interferenced and Carlos are interferenced and Carlos are interferenced and Carlos and Carlos are interferenced and Carlos are inte		10 11 400 - 0	
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ANL. CF & Sanctions policy approved as in the Entity's ALL. CF & Sanctions policy approved at least annually by the Board requirements Serior in Comment of the Comment of		Training and Education	
ANL, CTP & Sanctons Compliance Department? 2 Is the Emily ANL, CTP & Sanctons policy approved at least annual by the Board or equivalent Senior Management Committee? To Mestorich your practice in Oueston 29. 25 Does the Emily and CTP & Sanctons policy and any components of the ANL, CTP, & Sanctons programme? 26 Dees the Emily Least Burden is to carry and any components of the ANL, CTP & Sanctons programme? 27 Does the emily have a whisileblower policy? 28 Oues the emily have a whisileblower policy? 28 Oues the emily have a whisileblower policy? 29 Dees the emily have a whisileblower policy? 29 Oues the emily have a whisileblower policy? 20 Oues the emily have a whisileblower policy? 20 Oues the emily have a whisileblower policy? 20 Oues the emily have a whisileblower policy? 21 Oues the emily have a whisileblower policy? 22 Oues the emily have a whisileblower policy? 23 Oues the emily have a whisileblower policy? 24 Oues the emily have a whisileblower policy? 25 Oues the emily have a whisileblower policy? 26 Oues the emily have a whisileblower policy? 27 Oues the emily have a whisileblower policy? 28 Oues the emily have a whisileblower policy? 29 If appropriate, powde any additional information/context to the answers in this section. 4. ANTI ERIBERY & CORRUPTION 30 If his the Emily documented policies and procedures consistent with applicable APC policy and procedures consistent with applicable APC policy and procedures consistent with applicable of policy and procedures consistent with applicable of policy and procedures consistent with applicable or policy and procedures consistent with applicable for coordinality and CTP, and the APC programme? 31 Oues the Emily have adequate attain with appropriate levels of separance-Department to have a good and according to have a good and according to have a good and according to the policy applicable to implement the APC policy that the policy and procedures or the policy applicable to implement or policy that the policy and procedure in the last		9	
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components detailed below: 40 a Potential liability created by intermediaries and		is the net result of the controls effectiveness and the inherent risk assessment?	
	40		
	40 a		

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

49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	
49	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	
49 n	Outline the processes for the maintenance of internal "watchlists"	
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	
51	Does the Entity have record retention procedures that comply with applicable laws?	
51 a	If Y, what is the retention period?	
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context to the answers in this section.	
		<u> </u>
6. AML, CTF 54	& SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	
54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	
54 a 54 b 54 c 54 d 555	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
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58 e	Name Screening	
58 f	Transaction Screening	
58 g	Training and Education	
59	Has the Entity's Sanctions EWRA been completed in	
	the last 12 months?	
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	
	·	
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context to the answers in this section.	
7. KYC, C	DD and EDD	
62	Does the Entity verify the identity of the customer?	
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	
64 b	Expected activity	
64 c	Nature of business/employment	
64 d	Ownership structure	
64 e	·	
	Product usage	
64 f	Purpose and nature of relationship	
64 g	Source of funds	
64 h	Source of wealth	
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	
65 a1	Are ultimate beneficial owners verified?	
65 b	Authorised signatories (where applicable)	
65 с	Key controllers	
65 d	Other relevant parties	
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	
67	Does the due diligence process result in customers receiving a risk classification?	
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	
67 a2	Geography	
67 a3	Business Type/Industry	
67 a4	Legal Entity type	
67 a5	Adverse Information	
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	
68 a	If Y, is this at:	
68 a1	Onboarding	
68 a2	KYC renewal	
68 a3	Trigger event	
68 a4	Other	
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	
69 a	If Y, is this at:	
69 a1	Onboarding	
69 a2	KYC renewal	

60.02	Trigger event	
69 a3	Trigger event	
	What is the method used by the Entity to screen for Adverse Media/Negative News?	
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
71 a	If Y, is this at:	
71 a1	Onboarding	
71 a2	KYC renewal	
71 a3	Trigger event	
72	What is the method used by the Entity to screen PEPs?	
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	
74 a	If yes, select all that apply:	
74 a1	Less than one year	
74 a2	1 – 2 years	
74 a3	3 – 4 years	
74 a4 74 a5	5 years or more Trigger-based or perpetual monitoring reviews	
74 a5	Other (Please specify)	
14 40	Outer (Frease specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	
76 b	Respondent Banks	
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	
76 d	Extractive industries	
76 e	Gambling customers	
76 f	General Trading Companies	
76 g	Marijuana-related Entities	
76 h	MSB/MVTS customers	
76 i	Non-account customers	
76 j	Non-Government Organisations	
76 k	Non-resident customers	
76 I	Nuclear power	
76 m	Payment Service Providers	
76 n	PEPs	
76 o	PEP Close Associates	
76 p	PEP Related	
76 q	Precious metals and stones	
76 r	Red light businesses/Adult entertainment	
76 s	Regulated charities	
76 t	Shell banks	
76 u	Travel and Tour Companies	
76 v	Unregulated charities	
76 w	Used Car Dealers	
76 x	Virtual Asset Service Providers	
76 y	Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	

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

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
00 -	'	
93 a	FATF Recommendation 16	
93 b	Local Regulations	
93 b1	If Y, specify the regulation	
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC	TIONS	
98	Does the Entity have a Sanctions Policy approved by	
	management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	
102	What is the method used by the Entity for sanctions screening?	
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	
104	What is the method used by the Entity?	

programme to ensure that compeleé data for all transactions are subject to an action sarrening? 106 a Select the Sanctions Lists used by the Emity in its sanctions screening processes: 106 a Consolidated United Nations Security Council Sanctions List (IVI) 106 b United Sites Department of the Treasury's Office of United Sites Department of United Sites Departm			
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International Common	106 b		
University Uni	106 с	l ·	
University Uni	106 d	European Union Consolidated List (EU)	
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	114 a		
	115		

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

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