the Wolfsberg Group

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	
2	by this questionnaire	
	by this questionnane	
3	Full Legal (Registered) Address	
4	Full Primary Business Address (if different from	
	above)	
5	Date of Entity incorporation/establishment	
6	Select type of ownership and append an ownership	
-	chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	
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	
oui	beneficial owners with a holding of 10% or more	
	beneficial entries with a holding of 10% of more	
-		
7	% of the Entity's total shares composed of bearer	
	shares	
8	Does the Entity, or any of its branches, operate under	
	an Offshore Banking License (OBL)?	
8 a	If Y, provide the name of the relevant branch/es	
	which operate under an OBL	
9	Does the Bank have a Virtual Bank License or	
	provide services only through online channels?	
10	Name of primary financial regulator/supervisory	
	authority	
11	Provide Legal Entity Identifier (LEI) if available	
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10	Dravida tha full logal name of the ultimate new of the	
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	

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19 a1h2 MVTSs		(FOFS)!	
19 a1h2 MVTSs	19 a1h1	MSBs	
	19 81113	rors	

19 a1i	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	
	MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	
19 c	Cross-Border Remittances	
19 d	Domestic Bulk Cash Delivery	
	· · · · · · · · · · · · · · · · · · ·	
19 e	Hold Mail	
19 f	International Cash Letter	
19 g	Low Price Securities	
19 h	Payable Through Accounts	
19 i	Payment services to non-bank entities who may	
	then offer third party payment services to their	
	customers?	
19 i1	If V places calest all that apply below?	
-	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	
1313		
10 ;	Private Ranking	
19 j	Private Banking	
19 k	Remote Deposit Capture (RDC)	
19 I	Sponsoring Private ATMs	
19 m	Stored Value Instruments	
19 n	Trade Finance	
19 0	Virtual Assets	
19 р	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	Charle apphing convice	
	Check cashing service	
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	
19 p3a	If yes, state the applicable level of due diligence	
19 p3a 19 p4		
	Sale of Monetary Instruments	
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	
	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 branchies that this applies to.	
21	If appropriate, provide any additional	
21	If appropriate, provide any additional	
21	If appropriate, provide any additional information/context to the answers in this section.	
21		
21		
	information/context to the answers in this section.	
3. AML, C	information/context to the answers in this section. IF & SANCTIONS PROGRAMME	
	information/context to the answers in this section. IF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum	
3. AML, C	information/context to the answers in this section. IF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the	
3. AML, C	information/context to the answers in this section. IF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum	
3. AML, C1 22	information/context to the answers in this section. IF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
3. AML, CT 22 22 a	information/context to the answers in this section. IF & 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	
3. AML, C 22 22 a 22 b	information/context to the answers in this section. IF & 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	
3. AML, C ⁺ 22 22 a 22 b 22 c	information/context to the answers in this section. IF & 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	
3. AML, C 22 22 a 22 b	information/context to the answers in this section. IF & 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	
3. AML, C ⁺ 22 22 a 22 b 22 c	information/context to the answers in this section. IF & 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	
3. AML, C ¹ 22 a 22 b 22 c 22 c 22 d 22 e	information/context to the answers in this section. IF & 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	
3. AML, C 22 22 a 22 b 22 c 22 c 22 c 22 c 22 c 22 c 22 c	information/context to the answers in this section. IF & 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	
3. AML, C 22 22 a 22 b 22 c 22 c 22 c 22 c 22 c 22 c 22 c	information/context to the answers in this section. IFF & 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	
3. AML, C1 22 22 b 22 c 22 c 22 d 22 c 22 d 22 c 22 f 22 g 22 h	information/context to the answers in this section. IF & 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	
3. AML, C 22 22 a 22 b 22 c 22 c 22 c 22 c 22 c 22 c 22 c	information/context to the answers in this section. IFF & 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	
3. AML, C1 22 22 a 22 b 22 c 22 c 22 c 22 c 22 c 22 f 22 g 22 f 22 g 22 h 22 i	information/context to the answers in this section. IFF & 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 EDD Independent Testing Periodic Review Policies and Procedures	
3. AML, C1 22 22 b 22 c 22 c 22 c 22 c 22 c 22 c 2	information/context to the answers in this section. IF & 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	
3. AML, C1 22 22 a 22 b 22 c 22 c 22 c 22 c 22 f 22 g 22 f 22 g 22 f 22 j 22 j 22 k	information/context to the answers in this section. IF & 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	
3. AML, C 22 22 a 22 b 22 c 22 c 22 c 22 c 22 f 22 g 22 f 22 g 22 h 22 i 22 j	information/context to the answers in this section. IF & 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	

22 m	Suspicious Activity Reporting	
22 n	Training and Education	
22 o	Transaction Monitoring	
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	
4. ANTI	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	
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 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:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	
35 b	Includes enhanced requirements regarding interaction with public officials?	
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	
38 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 public officials	
40 d	Corruption risks associated with gifts and	
	hospitality, hiring/internships, charitable donations and political contributions	
40 -		
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 42 e	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	
45	information/context to the answers in this section.	
1		
1		
5. AML. C	TF & SANCTIONS POLICIES & PROCEDURES	
5. AML, C 46	TF & SANCTIONS POLICIES & PROCEDURES Has the Entity documented policies and procedures	
	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions	
	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent,	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 46 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering	
46 46 a 46 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing	
46 46 a 46 b 46 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations	
46 a 46 b 46 c 47	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually?	
46 46 a 46 b 46 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at	
46 46 a 46 b 46 c 47	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and	
46 46 a 46 b 46 c 47 48	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against:	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 a 48 b 48 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 a 48 b 48 b 48 b 49	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that:	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 a 48 b 48 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 a 48 b 48 b 48 b 49	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 48 b 48 b 49 49 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 49 b 49 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 49 a 49 a 49 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks	
46 46 a 46 b 46 c 47 48 a 48 a1 48 b1 49 a 49 b 49 c 49 c 49 d 49 e	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks	
46 46 a 46 b 46 c 47 48 a 48 a1 48 b1 49 a 49 c 49 d	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides	
46 46 a 46 b 46 c 47 48 a 48 a1 48 b1 49 a 49 b 49 c 49 c 49 d 49 e	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 49 b 49 a 49 b 49 c 49 c 49 c 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dpening and keeping of accounts for section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents,	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 49 b 49 a 49 b 49 c 49 c 49 c 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 49 b 49 a 49 b 49 c 49 c 49 c 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dpening and keeping of accounts for section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents,	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 49 b 49 a 49 b 49 c 49 c 49 c 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities 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 Assess the risks of relationships with domestic and	
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 49 b 49 a 49 b 49 c 49 c 49 c 49 c 49 c 49 c 49 c 49 c 49 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dpening and keeping of accounts for section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed houses, casa de cambio, bureaux de change or money transfer agents	

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

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 65 -	Are each of the following identified:	
65 a	Ultimate beneficial ownership	
65 a1	Are ultimate beneficial owners verified?	
65 b 65 c	Authorised signatories (where applicable) Key controllers	
65 C 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 67 a6	Adverse Information 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 68 a4a	Other If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	
69 a	If Y, is this at:	
69 a1	Onboarding	
69 a2	KYC renewal	

69 a3	Trigger event	
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
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	
74 a5 74 a6	Trigger-based or perpetual monitoring reviews	
74 80	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	
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	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?	

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78 a	If Y indicate who provides the approval:	
79	Does the Entity have specific procedures for	
13	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. MONIT	ORING & 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	
04	transactions for suspicious activities?	
L		
84 a	If manual or combination selected, specify what	
1	type of transactions are monitored manually	
1		
1		
L		
	If automated or combination selected, are internal	
84 b	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 we the teal last undeted?	
84 b2	When was the tool last updated?	
	Miles and the sector of Terror and the Manifester	
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?	
	roporting rodanomorito :	
86	Does the Entity have policies, procedures and	
1	processes to review and escalate matters arising from	
1	the monitoring of customer transactions and activity?	
	1	
87	Does the Entity have a data quality management	
1	programme to ensure that complete data for all	
1	transactions are subject to monitoring?	
	, , , , , , , , , , , , , , , , , , , ,	
88	Does the Entity have processes in place to respond	
	to Request For Information (RFIs) from other entities	
1	in a timely manner?	
L		
89	Does the Entity have processes in place to send	
1	Requests for Information (RFIs) to their customers in	
1	a timely manner?	
90	Confirm that all responses provided in the above	
30		
	Section are representative of all the LE's branches	
90 a	If N, clarify which questions the difference/s relate to	
1	and the branch/es that this applies to	
1		
1		
91	If appropriate, provide any additional	
	information/context to the answers in this section.	
1		
1		
1		
9. PAYME	NT TRANSPARENCY	
92		
~ <u>~</u>	Does the Entity adhere to the Wolfsberg Group	
1	Payment Transparency Standards?	

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	
93 b	Local Regulations	
93 b1	If Y, specify the regulation	
35 01		
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	
96	Confirm that all responses provided in the above Section 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 102 a1a	Are internal system of vendor-sourced tools used? If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	
104	What is the method used by the Entity?	

105	Does the Entity have a data quality management	
	programme to ensure that complete data for all	
	transactions are subject to sanctions screening?	
106	Select the Sanctions Lists used by the Entity in its	
100	sanctions screening processes:	
106 a	Consolidated United Nations Security Council	
100 a	Sanctions List (UN)	
4001		
106 b	United States Department of the Treasury's Office of	
	Foreign Assets Control (OFAC)	
106 c	Office of Financial Sanctions Implementation HMT	
	(OFSI)	
106 d	European Union Consolidated List (EU)	
106 e	Lists maintained by other G7 member countries	
106 f	Other (specify)	
107	When regulatory authorities make updates to their	
	Sanctions list, how many business days before the	
	entity updates their active manual and/or automated	
	screening systems against:	
107 a	Customer Data	
107 a 107 b	Transactions	
107 b 108		
100	Does the Entity have a physical presence, e.g.	
	branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC,	
	OFSI, EU or G7 member countries have enacted	
	comprehensive jurisdiction-based Sanctions?	
109		
109	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches	
109 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
110	If appropriate, provide any additional	
	information/context to the answers in this section.	
11. TRAINI	NG & EDUCATION	
111	Does the Entity provide mandatory training, which	
	includes:	
111 a	Identification and reporting of transactions to	
	government authorities	
111 b	Examples of different forms of money laundering,	
	terrorist financing and sanctions violations relevant	
	for the types of products and services offered	
111 c	Internal policies for controlling money laundering,	
	terrorist financing and sanctions violations	
111 d	New issues that occur in the market, e.g. significant	
	regulatory actions or new regulations	
111 e	Conduct and Culture	
111 f	Fraud	
112	Is the above mandatory training provided to:	
112 112 a	Board and Senior Committee Management	
112 a 112 b	1st Line of Defence	
112 D 112 c	2nd Line of Defence	
112 c 112 d	3rd Line of Defence	
112 e	Third parties to which specific FCC activities have been outsourced	
440.5		
112 f	Non-employed workers (contractors/consultants)	
113	Does the Entity provide AML, CTF & Sanctions training	
	that is targeted to specific roles, responsibilities and	
	high-risk products, services and activities?	
114	high-risk products, services and activities? Does the Entity provide customised training for AML,	
	high-risk products, services and activities? Does the Entity provide customised training for AML, CTF and Sanctions staff?	
114 a	high-risk products, services and activities? Does the Entity provide customised training for AML, CTF and Sanctions staff? If Y, how frequently is training delivered?	
	high-risk products, services and activities? Does the Entity provide customised training for AML, CTF and Sanctions staff?	

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	
110	If appropriate, provide any additional information/context to the answers in this section.	
12. QUALIT	Y ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based	
	Quality Assurance programme for financial crime (separate from the independent Audit function)?	
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,	
122	Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	
122 b	External Third Party	
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and	
	procedures	
123 b	Enterprise Wide Risk Assessment	
123 c 123 d	Governance KYC/CDD/EDD and underlying methodologies	
123 u 123 e	Name Screening & List Management	
123 f	Reporting/Metrics & Management Information	
123 g	Suspicious Activity Filing	
123 h	Technology	
123 i 123 j	Transaction Monitoring Transaction Screening including for sanctions	
123 J 123 k	Training & Education	
123	Other (specify)	
124	Are adverse findings from internal & external audit	
	tracked to completion and assessed for adequacy	
	and completeness?	
125	Confirm that all responses provided in the above section are representative of all the LE's branches	
125 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
126	If annonriate, provide any additional	
120	If appropriate, provide any additional information/context to the answers in this section.	
14. FRAU		
127	Does the Entity have policies in place addressing	
128	fraud risk? Does the Entity have a dedicated team responsible	
120	for preventing & detecting fraud?	
		1

129	Does the Entity have real time monitoring to detect fraud?	
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	
131	Confirm that all responses provided in the above section are representative of all the LE's branches	
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	
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)		
(Financial Institution name) is fully committed to the fight against financial crime and makes		
every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.		
The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.		
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.		
The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.		
The Financial Institution commits to file accurate supplemental information on a timely basis.		
I, (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.		
I, (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.		
(Signature & Date)		
(Signature & Date)		



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