

Financial Institution Name: Location (Country) :

B Bank Ltd.	
ingary	

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.

	erially different than its Entity Head Office, a separate questionnaire can	
No #	Question	Answer
	& OWNERSHIP	
1	Full Legal Name	
		CIB Bank Ltd.
2	Append a list of foreign branches which are covered by	
	this questionnaire	n/a
		Iva
3	Full Legal (Registered) Address	Petrezselyem utca 2-8.
		BUDAPEST
		HUNGARY
		HU-1024
4	Full Primary Business Address (if different from above)	
		n/a
5	Date of Entity incorporation/establishment	
-	. 7	
		19/11/1979
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	110
ou.	symbol	
	•	
6 b	Member Owned/Mutual	No No
6 C	Government or State Owned by 25% or more	No No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	
		CIB Bank Ltd. is 100% owned subsidiary of Intesa Sanpaolo S.p.A. (Italy)
7	% of the Entity's total shares composed of bearer shares	
-		
		n/a
8	Does the Entity, or any of its branches, operate under an	
· ·	Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which	
	operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide	
	services only through online channels?	no
10	Name of primary financial regulator/supervisory authority	
		Control Deals of Houses
		Central Bank of Hungary
11	Provide Legal Entity Identifier (LEI) if available	
		E 40000MOVENIIVOODMEOO
		549300MSY5NIVC0BME80
12	Provide the full legal name of the ultimate parent (if	
_	different from the Entity completing the DDQ)	
		Intesa Sanpaolo S.p.A.
13	Jurisdiction of licensing authority and regulator of ultimate	
13	parent	
		Italy, Banca d'Italia (Bank of Italy)

14	1	
177	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b	Private Banking	Yes
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	Yes
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No l
14 k	Other (please explain)	
14 K	Other (piease explain)	
		n/a
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	
	jurisdiction to the location where bank services are	
	provided)	
45		
15 a	If Y, provide the top five countries where the non-	
	resident customers are located.	
40	Select the closest value:	
16		
16 a	Number of employees	1001-5000
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section	
17		No branches
	are representative of all the LE's branches.	The Stationies
17 a	If N, clarify which questions the difference/s relate to	
17 a		
	and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context	
	to the answers in this section.	
	to the answers in this section.	7/0
		n/a
2. PRODU	ICTS & SERVICES	
19	Does the Entity offer the following products and services:	
19	boes the Entity offer the following products and services.	
19 a	Correspondent Banking	
10 u	Correspondent Banking	Yes
		Yes
19 a1	If Y	Yes
	If Y  Does the Entity offer Correspondent Banking	Yes Yes
19 a1 19 a1a	If Y  Does the Entity offer Correspondent Banking services to domestic banks?	
19 a1	If Y  Does the Entity offer Correspondent Banking	Yes
19 a1 19 a1a	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to	
19 a1 19 a1a 19 a1b	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?	Yes
19 a1 19 a1a	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in	Yes No
19 a1 19 a1a 19 a1b	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with	Yes
19 a1 19 a1a 19 a1b	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes No
19 a1 19 a1a 19 a1b 19 a1c	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes No Yes
19 a1 19 a1a 19 a1b	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking	Yes No
19 a1 19 a1a 19 a1b 19 a1c	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?	Yes No Yes
19 a1 19 a1a 19 a1b 19 a1c	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships	Yes No Yes Yes
19 a1 19 a1a 19 a1b 19 a1c	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?	Yes No Yes
19 a1 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1e	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?	Yes No Yes Yes
19 a1 19 a1a 19 a1b 19 a1c	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?	Yes No Yes Yes No
19 a1 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1e	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with	Yes No Yes Yes
19 a1 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1d 19 a1f	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Yes No Yes Yes No
19 a1 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1e	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking	Yes No Yes Yes Yes Yes Yes No Yes
19 a1 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1d 19 a1f	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking	Yes No Yes Yes Yes Yes Yes
19 a1 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1d 19 a1f	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	Yes No Yes Yes Yes Yes Yes
19 a1 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1d 19 a1f	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking	Yes No Yes Yes Yes Yes Yes
19 a1 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1e 19 a1f 19 a1g	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity forer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	Yes No Yes Yes Yes Yes Yes
19 a1 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1d 19 a1f	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships	Yes No Yes Yes Yes Yes Yes No Yes
19 a1 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1e 19 a1f 19 a1g	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	Yes No Yes Yes Yes Yes Yes
19 a1 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f 19 a1g	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	Yes No Yes Yes Yes No No No Yes
19 a1 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f 19 a1g	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	Yes No Yes Yes Yes Yes Yes No Yes
19 a1 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1e 19 a1f 19 a1g 19 a1h 19 a1h	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity forer Correspondent Banking services to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?  MSBs	Yes No Yes Yes Yes No No No Yes No
19 a1 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1f 19 a1f 19 a1h 19 a1h 19 a1h2	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity forer Correspondent Banking services to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?  MSBs  MVTSs	Yes No Yes Yes Yes No
19 a1 19 a1b 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f 19 a1g	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity forer Correspondent Banking services to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?  MSBs	Yes No Yes Yes Yes No No No Yes No

19 a1i	Does the Entity have processes and procedures in	
	place to identify downstream relationships with	Yes
	MSBs /MVTSs/PSPs?	
40 b	Cross-Border Bulk Cash Delivery	No
<u>19 b</u>		No .
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No
19 f	International Cash Letter	No
19 g		No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then	
	offer third party payment services to their customers?	No
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	
19 j	Private Banking	Domestic
19 k	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	No
	Stored Value Instruments	No
19 m		
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
19 p	For each of the following please state whether you	
. o p	offer the service to walk-in customers and if so, the	
	applicable level of due diligence:	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	No
		NO .
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	Yes
19 p3 19 p3a	Foreign currency conversion  If yes, state the applicable level of due diligence	Identification and Verification
19 p3 19 p3a 19 p4	Foreign currency conversion  If yes, state the applicable level of due diligence Sale of Monetary Instruments	
19 p3 19 p3a 19 p4 19 p4a	Foreign currency conversion  If yes, state the applicable level of due diligence Sale of Monetary Instruments  If yes, state the applicable level of due diligence	Identification and Verification
19 p3 19 p3a 19 p4	Foreign currency conversion  If yes, state the applicable level of due diligence Sale of Monetary Instruments	Identification and Verification
19 p3 19 p3a 19 p4 19 p4a	Foreign currency conversion  If yes, state the applicable level of due diligence Sale of Monetary Instruments  If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)	Identification and Verification  No  The walk-in customers are served for cuirrency-exchange only; similar customer due diligence applied than to
19 p3 19 p3a 19 p4 19 p4 19 p5 19 q 20	Foreign currency conversion  If yes, state the applicable level of due diligence Sale of Monetary Instruments  If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.	Identification and Verification  No  The walk-in customers are served for cuirrency-exchange only; similar customer due diligence applied than to other customers.
19 p3 19 p3a 19 p4 19 p4 19 p5 19 p5	Foreign currency conversion  If yes, state the applicable level of due diligence Sale of Monetary Instruments  If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section	Identification and Verification  No  The walk-in customers are served for cuirrency-exchange only; similar customer due diligence applied than to other customers.
19 p3 19 p3a 19 p4 19 p4 19 p5 19 q 20 20 a	Foreign currency conversion  If yes, state the applicable level of due diligence Sale of Monetary Instruments  If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Identification and Verification  No  The walk-in customers are served for cuirrency-exchange only; similar customer due diligence applied than to other customers.
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19 p3 19 p3a 19 p4 19 p4 19 p4 19 p5 19 q 20 20 a 21	Foreign currency conversion  If yes, state the applicable level of due diligence Sale of Monetary Instruments  If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.	Identification and Verification  No  The walk-in customers are served for cuirrency-exchange only; similar customer due diligence applied than to other customers.  n/a  No branches
19 p3 19 p3a 19 p4 19 p4 19 p4 19 p5 19 q 20 20 a 21 3. AML, CT 22	Foreign currency conversion  If yes, state the applicable level of due diligence Sale of Monetary Instruments  If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  F & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	Identification and Verification No  The walk-in customers are served for cuirrency-exchange only; similar customer due diligence applied than to other customers.  n/a  No branches  n/a
19 p3 19 p3a 19 p4 19 p4 19 p4 19 p5 19 q 20 20 a 21	Foreign currency conversion  If yes, state the applicable level of due diligence Sale of Monetary Instruments  If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.	Identification and Verification  No  The walk-in customers are served for cuirrency-exchange only; similar customer due diligence applied than to other customers.  n/a  No branches
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19 p3 19 p3a 19 p4a 19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b	Foreign currency conversion  If yes, state the applicable level of due diligence Sale of Monetary Instruments  If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  F & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening	Identification and Verification No  The walk-in customers are served for cuirrency-exchange only; similar customer due diligence applied than to other customers.  n/a  No branches  n/a  Yes Yes
19 p3 19 p3a 19 p4a 19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c	Foreign currency conversion  If yes, state the applicable level of due diligence Sale of Monetary Instruments  If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  F & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership	Identification and Verification No  The walk-in customers are served for cuirrency-exchange only; similar customer due diligence applied than to other customers.  n/a  No branches  n/a  Yes Yes Yes
19 p3 19 p3a 19 p4 19 p4 19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d	Foreign currency conversion  If yes, state the applicable level of due diligence Sale of Monetary Instruments  If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  F & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting	Identification and Verification No  The walk-in customers are served for cuirrency-exchange only; similar customer due diligence applied than to other customers.  n/a  No branches  n/a  Yes Yes Yes Yes Yes Yes
19 p3 19 p3a 19 p4a 19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c	Foreign currency conversion  If yes, state the applicable level of due diligence Sale of Monetary Instruments  If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  F & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership	Identification and Verification No  The walk-in customers are served for cuirrency-exchange only; similar customer due diligence applied than to other customers.  n/a  No branches  n/a  Yes Yes Yes
19 p3 19 p3a 19 p4 19 p4a 19 p4a 19 p5 19 q 20 20 a 21 21 22 a 22 a 22 c 22 c 22 c 22 c	Foreign currency conversion  If yes, state the applicable level of due diligence Sale of Monetary Instruments  If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  F & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting	Identification and Verification No  The walk-in customers are served for cuirrency-exchange only; similar customer due diligence applied than to other customers.  n/a  No branches  r/a  Yes Yes Yes Yes Yes Yes
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-	T	ls.
22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML,	1-10
24	CTF & Sanctions Compliance Department?  Is the Entity's AML, CTF & Sanctions policy approved at	
24	least annually by the Board or equivalent Senior	
	Management Committee? If N, describe your practice in	Yes
	Question 29.	
25	Does the Board receive, assess, and challenge regular	
	reporting on the status of the AML, CTF, & Sanctions	Yes
	programme?	
26	Does the Entity use third parties to carry out any	
	components of its AML, CTF & Sanctions programme?	Yes
26 a	If Y, provide further details	
	,,	The first and second level od sanction screening of the transactions of uotsourced within Intesa Sanpaolo Group.
		In case of pontential match, the final decision is made at CIB Bank level, as well as all necessary steps to be
		taken in such cases.
27	Door the entity have a whictlehlawer policy?	Vea
27 28	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches
28 a	If N, clarify which questions the difference/s relate to	
20 u	and the branch/es that this applies to.	
	If appropriate provide any additional information /	
29	If appropriate, provide any additional information/context to the answers in this section.	
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4. ANTI BE	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and	Yes
	requirements to reasonably prevent, detect and report	
	bribery and corruption?	
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers	
32	with sufficient experience/expertise responsible for	Yes
	coordinating the ABC programme?	
33	Does the Entity have adequate staff with appropriate	
	levels of experience/expertise to implement the ABC	Yes
	programme?	
34	Is the Entity's ABC programme applicable to:	Third parties acting on behalf of the Entity
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	Yes
	improperly intended to influence action or obtain an	
0F I:	advantage	
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 c	Includes a prohibition against the falsification of books	
33 0	and records (this may be within the ABC policy or any	
	other policy applicable to the Legal Entity)?	Yes
	This point, applicable to the Logar Littley):	
	D # 5 @ 1	
36	Does the Entity have controls in place to monitor the	Yes
27	effectiveness of their ABC programme?	
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
20		
38	Has the Entity's ABC Enterprise Wide Risk Assessment	V
	(EWRA) been completed in the last 12 months?	Yes
20.5	If N. provide the data when the last ADO EMD A	
38 a	If N, provide the date when the last ABC EWRA was completed.	
	completed.	Q4 2024
39	Does the Entity have an ABC residual risk rating that is	v.
	the net result of the controls effectiveness and the	Yes
40	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	.,
70 u	third-party providers as appropriate	Yes
40 b	Corruption risks associated with the countries and	
	industries in which the Entity does business, directly or	Yes
	through intermediaries	
40 c	Transactions, products or services, including those	
	that involve state-owned or state-controlled entities or	Yes
	public officials	

bringhierenberg, chambles donations and political contributions  40 e Changes in business activities that may materially bringhierenberg, chambles donations and political contributions  41 bringhierenberg, chambles described in the may materially bringhierenberg, chambles and procedures?  42 Dose the Entity provide mandatory ABC training to:  42 a Sourd and senior Committee Management Ves  42 b Stat Line of Defence Ves  42 c 2nd Line of Defence Ves  42 c 2nd Line of Defence Ves  42 d 2nd Line of Defence Ves  42 d 2nd Line of Defence Ves  42 d 3nd Line of Defence Ves  42 d 3nd Line of Defence Ves  43 bose the Entity provide activities of the provide activities	
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(contractors/consultants)  No  Soe the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?  At a Confirm that all responses provided in the above Section are representative of all the LE's branches  If N, Carry 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.  If appropriate, provide any additional information/context to the answers in this section.  The Bank provides to 3rd party contractors its ABC Policy and they shall confirm that they resp of the Bank. A uniform annual ABC training is provided to all staff.    Author	
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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 b EU Standards  48 b EU Standards  48 b If Y, does the Entity retain a record of the results?  48 b If Y, does the Entity retain a record of the results?  49 Does the Entity have policies and procedures that:  49 a Prohibit the opening and keeping of anonymous and fictitious named accounts  49 b Prohibit dealing with other entities that provide banking services to unlicensed banks and/or NBFIs  49 c Prohibit dealing with other entities that provide banking services to unlicensed banks  49 d Prohibit dealing with another entity that provides services to shell banks  49 f Prohibit opening and keeping of accounts for Section 311 designated entities  49 g Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges	
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48 b EU Standards 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 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 Yes 49 e Prohibit dealing with another entity that provides services to shell banks 49 f Prohibit opening and keeping of accounts for Section 311 designated entities 49 g Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges	
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49 e Prohibit dealing with another entity that provides services to shell banks  49 f Prohibit opening and keeping of accounts for Section 311 designated entities  49 g Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges	
services to shell banks  49 f Prohibit opening and keeping of accounts for Section 311 designated entities  49 g Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges	
311 designated entities  49 g Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges	
unlicensed/unregulated remittance agents, exchanges	
money transfer agents	
49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates  Yes	

49 i	Define the process for escalating financial crime risk	
401	issues/potentially suspicious activity identified by	Yes
		165
	employees	
49 j	Define the process, where appropriate, for terminating	
•	existing customer relationships due to financial crime	Yes
	risk	
40.1		
49 k	Define the process for exiting clients for financial	
	crime reasons that applies across the entity, including	Yes
	foreign branches and affiliates	
49 I	Define the process and controls to identify and handle	
431		
	customers that were previously exited for financial	Yes
	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	Yes
	Sanctions, FEFS 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	L.
	similar document which defines a risk boundary around	Yes
	their business?	
51	Does the Entity have record retention procedures that	
	comply with applicable laws?	Yes
F4 -		
51 a	If Y, what is the retention period?	
		5 years or more
52	Confirm that all responses provided in the above Section	
-	are representative of all the LE's branches	No 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.	
		n/a
C AMI C	FF & CANCTIONS DISK ASSESSMENT	
	F & SANCTIONS RISK ASSESSMENT	
6. AML, C7	Does the Entity's AML & CTF EWRA cover the inherent	
	Does the Entity's AML & CTF EWRA cover the inherent	Yes
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	Yes
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel	Yes Yes
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography	Yes
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls	Yes Yes
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography	Yes Yes
54 a 54 b 54 c 54 d 55	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
54 a 54 b 54 c 54 d 55 55 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 a 55 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 a 55 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	Yes
54 a 54 b 54 c 54 d 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative	Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 a 55 b 55 c 55 d 55 e	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
54 a 54 b 54 c 54 d 55 c 55 c 55 d 55 e	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
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 e 55 f 55 g	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes
54 a 54 b 54 c 54 d 55 c 55 c 55 d 55 e	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
54 a 54 b 54 c 54 d 55 a 55 a 55 c 55 d 55 e 55 f 55 g 55 h	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 e 55 f 55 g	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in	Yes
54 a 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	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
54 a 54 b 54 c 54 c 54 d 55 a 55 a 55 c 55 d 55 e 55 f 55 g 55 h	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF	Yes
54 a 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	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
54 a 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	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
54 a 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	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
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 555 c 555 g 555 h 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.	Yes
54 a 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	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
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 555 c 555 g 555 h 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e  55 f 55 g 55 h 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes         Yes
54 a 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 c 55 f 55 g 55 h 56 a 57 a 57 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 a 57 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
54 a 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 c 55 f 55 g 55 h 56 a 57 a 57 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 a 57 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 f 55 g 55 h 56 a 57 a 57 a 57 c 57 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education 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
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 c 55 f 55 g 55 h 56 a  57 a 57 a 57 b 57 c 57 c 57 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 d 55 a 55 f 55 a 55 f 55 g 55 h 56 a 57 a 57 a 57 c 57 d 58 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 f 56 a 57 a 57 a 57 a 57 d 58 a 58 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 a  57 a 57 a 57 a 57 b 57 c 57 d 58 a 58 b 58 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance List Management	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 f 55 g 55 f 56 a 57 a 57 a 57 a 57 d 58 58 a 58 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes

58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the	
00	last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA	
33 a	was completed.	
	was completed.	
60	Confirm that all responses provided in the above Section	
00	are representative of all the LE's branches	No branches
60 a	If N, clarify which questions the difference/s relate to	
60 a		
	and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context	
01	to the answers in this section.	
	to the answers in this section.	n/a
7 KYC CI	DD and EDD	
	Does the Entity verify the identity of the customer?	Yes
62		100
03	Do the Entity's policies and procedures set out when	Vec.
	CDD must be completed, e.g. at the time of onboarding	Yes
	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	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
	Source of runds Source of wealth	
64 h		No
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied to	
00	beneficial ownership identification?	25%
67	Does the due diligence process result in customers	
07	receiving a risk classification?	Yes
67 -	If Y, what factors/criteria are used to determine the	
67 a	The state of the s	
07.4	customer's risk classification? Select all that apply:	No.
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	Yes
67 a6	Other (specify)	
		Transaction risk
68	For high risk non-individual customers, is a site visit a part	No
	of your KYC process?	INU
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"	
	Dogo the Entity house a view hard a second to a	
69	Does the Entity have a risk based approach to screening	V
	customers for Adverse Media/Negative News?	Yes
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes
	•	

69 a3		<del>-</del>
	Trigger event	Yes
70	What is the method used by the Entity to screen for	Combination of subsected and account
	Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening	
/1		
	customers and connected parties to determine whether	Yes
	they are PEPs, or controlled by PEPs?	
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
	Trigger event	Yes
71 a3		Tes
72	What is the method used by the Entity to screen PEPs?	Automated
		Adomated
73	Does the Entity have policies, procedures and processes	
7.5	to review and escalate potential matches from screening	
		Voc
	customers and connected parties to determine whether	Yes
	they are PEPs, or controlled by PEPs?	
74	Is KYC renewed at defined frequencies based on risk	Yes
	rating (Periodic Reviews)?	Tes
74 a	If yes, select all that apply:	
74 a1	Less than one year	No
74 a2	1 – 2 years	
		Yes
74 a3	3 – 4 years	No
74 a4	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
	, , , , , , , , , , , , , , , , , , , ,	
75	Does the Entity maintain and report metrics on current	
	and past periodic or trigger event due diligence reviews?	Yes
	and past periodic of trigger event due diligence reviews:	165
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	1 EDD
	•	Always subject to EDD
76 b	Respondent Banks	Always subject to EDD
76 b1	If EDD or restricted, does the EDD assessment	
	contain the elements as set out in the Wolfsberg	Yes
	Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	EDD on risk-based approach
	Extractive industries	EDD on risk-based approach
	I Extractive industries	Always subject to EDD
76 d		
76 e	Gambling customers	
	Gambling customers General Trading Companies	EDD on risk-based approach
76 e	Gambling customers	
76 e 76 f 76 g	Gambling customers General Trading Companies Marijuana-related Entities	EDD on risk-based approach Prohibited
76 e 76 f 76 g 76 h	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers	EDD on risk-based approach Prohibited Prohibited
76 e 76 f 76 g 76 h 76 i	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers	EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 j	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations	EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach Always subject to EDD
76 e 76 f 76 g 76 h 76 i 76 j 76 k	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers	EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach Always subject to EDD EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power	EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry
76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 m	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers	EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry Restricted
76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power	EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry
76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 m 76 n	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers	EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry Restricted Always subject to EDD
76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 n 76 o	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates	EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry Restricted Always subject to EDD Always subject to EDD
76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 n 76 n 76 o 76 p	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related	EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry Restricted Always subject to EDD Always subject to EDD Always subject to EDD Always subject to EDD
76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 q	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones	EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry Restricted Always subject to EDD Always subject to EDD Always subject to EDD EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 i 76 n 76 n 76 o 76 p 76 q 76 q	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment	EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry Restricted Always subject to EDD Always subject to EDD Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach
76 e 76 f 76 g 76 i 76 i 76 j 76 k 76 i 76 n 76 n 76 n 76 o 76 p 76 g	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities	EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry Restricted Always subject to EDD Always subject to EDD Always subject to EDD Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Always subject to EDD
76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 i 76 n 76 n 76 o 76 p 76 q 76 q	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks	EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry Restricted Always subject to EDD Always subject to EDD Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Always subject to EDD Prohibited
76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 n 76 n 76 n 76 o 76 p 76 g	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities	EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry Restricted Always subject to EDD Always subject to EDD Always subject to EDD Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Always subject to EDD
76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 n 76 o 76 p 76 q 76 q 76 r 76 s 76 t 76 t	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies	EDD on risk-based approach Prohibited EDD on risk-based approach Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry Restricted Always subject to EDD Always subject to EDD Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Always subject to EDD Prohibited
76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 n 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities	EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry Restricted Always subject to EDD Always subject to EDD Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Always subject to EDD Prohibited EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 k 76 i 76 n 76 n 76 o 76 p 76 c 76 g 76 f 76 c 76 y 76 v 76 w	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers	EDD on risk-based approach Prohibited EDD on risk-based approach Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry Restricted Always subject to EDD Prohibited EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 n 76 n 76 n 76 n 76 o 76 p 76 g 76 r 76 s 76 t 76 v 76 w 76 w	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry Restricted Always subject to EDD Always subject to EDD Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Always subject to EDD Prohibited EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 i 76 n 76 n 76 n 76 o 76 p 76 c 76 g 76 f 76 c 76 y 76 v 76 w	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers	EDD on risk-based approach Prohibited EDD on risk-based approach Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry Restricted Always subject to EDD Prohibited EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 n 76 n 76 n 76 n 76 o 76 p 76 g 76 r 76 s 76 t 76 v 76 w 76 w	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	EDD on risk-based approach Prohibited EDD on risk-based approach Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry Restricted Always subject to EDD Prohibited EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 n 76 n 76 n 76 n 76 o 76 p 76 g 76 r 76 s 76 t 76 v 76 w 76 w	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	EDD on risk-based approach Prohibited EDD on risk-based approach Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry Restricted Always subject to EDD Prohibited EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 n 76 n 76 n 76 o 76 p 76 g 76 g 76 g 76 g 76 c	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	EDD on risk-based approach Prohibited EDD on risk-based approach Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry Restricted Always subject to EDD Prohibited EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 i 76 n 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 v	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	EDD on risk-based approach Prohibited EDD on risk-based approach Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry Restricted Always subject to EDD Prohibited EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 n 76 n 76 n 76 n 76 o 76 p 76 g 76 r 76 s 76 t 76 v 76 w 76 w	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	EDD on risk-based approach Prohibited EDD on risk-based approach Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry Restricted Always subject to EDD Prohibited EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 i 76 n 76 n 76 n 76 o 76 p 76 r 76 s 76 t 76 u 76 v 76 w 76 v	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	EDD on risk-based approach Prohibited EDD on risk-based approach Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry Restricted Always subject to EDD Always subject to EDD Always subject to EDD EDD on risk-based approach Always subject to EDD Prohibited EDD on risk-based approach EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited
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76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 i 76 n 76 n 76 n 76 o 76 p 76 r 76 s 76 t 76 u 76 v 76 w 76 v	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	EDD on risk-based approach Prohibited EDD on risk-based approach Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry Restricted Always subject to EDD Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 i 76 n 76 n 76 n 76 n 76 c 76 p 76 g 76 t 76 s 76 t 76 v 76 v 76 v 76 v 76 x 76 y	Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	EDD on risk-based approach Prohibited EDD on risk-based approach Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry Restricted Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited  EDD on risk-based approach Prohibited  The restriction is based on the provision of group and internal policies and a case-by-case risk assessment of

78 a	If Y indicate who provides the approval:	Compliance
79 a	Does the Entity have specific procedures for onboarding	- Companies
	entities that handle client money such as lawyers, accountants, consultants, real estate agents?	No
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	No 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.	Source of wealth information is collected in case of EDD process.  Non-account customers are those performing currency exchange.
8. MONIT	ORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	Transacions reported by internal referrals and those that are reviewed in the course of performing periodic reviews.
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Vendor-sourced tools
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	NetReveal
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	No 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.	n/a
9. PAYM	ENT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
	Transparency Glandards:	

	B	
93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	Pursuit of the Business of the Payment Services (Act LXXXV of 2009)
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	No 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.	n/a
10. SANCT	IONS	
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?	Automated
102 a	If 'automated' or 'both automated and manual' selected:	Vonder accurated tools
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Norkom / NetReveal
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Automated
105	Does the Entity have a data quality management programme to ensure that complete data for all	Yes
106	transactions are subject to sanctions screening?	
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

	<del>_</del>	,
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Office of Financial Sanctions Implementation HMT (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)	
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	No 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.	n/a
11. TRAININ	G & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
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	Yes
	regulatory actions or new regulations	165
111 e	regulatory actions or new regulations Conduct and Culture	Yes
111 e 111 f		
	Conduct and Culture	Yes
111 f	Conduct and Culture Fraud	Yes
111 f 112	Conduct and Culture Fraud Is the above mandatory training provided to :	Yes Yes
111 f 112 112 a 112 b	Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management	Yes Yes Yes Yes
111 f 112 112 a	Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence	Yes Yes Yes Yes
111 f 112 112 a 112 b 112 c	Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence	Yes Yes Yes Yes Yes Yes
111 f 112 112 a 112 b 112 c 112 d	Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have	Yes Yes Yes Yes Yes Yes Yes Yes
111 f 112 112 a 112 b 112 c 112 d 112 e	Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced	Yes
111 f 112 112 a 112 b 112 c 112 d 112 e	Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high	Yes
111 f 112 112 a 112 b 112 c 112 c 112 d 112 e 112 f 113	Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?  Does the Entity provide customised training for AML, CTF	Yes Yes Yes Yes Yes Yes Yes Yes Yes And Applicable Yes

115 a	If N, clarify which questions the difference/s relate to			
	and the branch/es that this applies to.			
116	If appropriate, provide any additional information/context to the answers in this section.			
	to the answers in this section.	n/a		
12 OLIALITY	L Y ASSURANCE /COMPLIANCE TESTING			
117	Does the Entity have a program wide risk based Quality			
	Assurance programme for financial crime (separate from the independent Audit function)?	Yes		
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes		
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	No 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.	n/a		
13. AUDIT				
121	In addition to inspections by the government			
	supervisors/regulators, does the Entity have an internal			
	audit function, a testing function or other independent	Yes		
	third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular			
	basis?			
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:			
122 a	Internal Audit Department	Component based reviews		
122 b	External Third Party	Yearly		
123	Does the internal audit function or other independent third party cover the following areas:			
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes		
123 b	Enterprise Wide Risk Assessment	Yes		
123 c	Governance	Yes		
123 d	KYC/CDD/EDD and underlying methodologies	Yes		
123 e	Name Screening & List Management	Yes		
123 f	Reporting/Metrics & Management Information Suspicious Activity Filing	Yes Yes		
123 g 123 h	Technology	Yes		
123 ii	Transaction Monitoring	Yes		
123 j	Transaction Screening including for sanctions	Yes		
123 k	Training & Education	Yes		
123	Other (specify)			
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes		
125	Confirm that all responses provided in the above section are representative of all the LE's branches	No 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.			
		n/a		
14. FRAUD				
14. FRAUI				
127	Does the Entity have policies in place addressing fraud risk?	Yes		
127	Does the Entity have policies in place addressing fraud risk?  Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes 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?	No
131	Confirm that all responses provided in the above section are representative of all the LE's branches	No 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.	n/a

## **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)

CIB Bank Ltd.

(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

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.

, Zoltán Tóth\_ (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, dr. Éva Takács (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.