



Financial Institution Name: Location (Country) :

Bank Saderat PLC United Kingdom

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

No #	.) is materially different than its Entity Head Office, a separate questionnal	
	Question  ( & OWNERSHIP	Answer
1. ENTITE	Full Legal Name	
•	l un Eogar Hamo	
		Bank Saderat PLC
2	Append a list of foreign branches which are covered by	
	this questionnaire	No Branches
3	Full Legal (Registered) Address	
		STATE OF THE
		5 Lothbury, London, EC2R 7HD
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	
		03/08/1973 as Iranian Overseas Investment Bank. Registration No. 1126618
		DOLOGITOTO do manian Overseas investment Dank. Negistration IVO. 1120010
6	Select type of ownership and append an ownership chart	
ь	if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	
6 b	Member Owned/Mutual	No
6 C	Government or State Owned by 25% or more	No 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	Wholly owned subsidiary of Bank Saderat Iran, Tehran. There is no UBO of 10% or more
7	% of the Entity's total shares composed of bearer shares	
	, , , , , , , , , , , , , , , , , , ,	00/
		0%
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	N/A
		1975
9	Does the Bank have a Virtual Bank License or provide	
<b>9</b>	services only through online channels?	no
10	Name of primary financial regulator/supervisory authority	
		Financial Conduct Authority (FCA. Prudential Regulation Authority (PRA)
		the state of the s
11	Provide Legal Entity Identifier (LEI) if available	
••	. 101.00 Logal Entity Robinson (LLI) ii available	
		2138008KTNTDICZU8L25
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	Bank Saderat Iran, Tehran
13	Jurisdiction of licensing authority and regulator of	
	ultimate parent	
		Iran. Central Bank of Iran
14	Select the business areas applicable to the Entity	Van
14 a 14 b	Retail Banking Private Banking	Yes No
17 10	ato Barming	1

14 c     Commercial Banking     Yes       14 d     Transactional Banking     Yes       14 e     Investment Banking     No       14 f     Financial Markets Trading     No       14 g     Securities Services/Custody     No       14 h     Broker/Dealer     No       14 i     Multilateral Development Bank     No       14 j     Wealth Management     No       14 k     Other (please explain)	
14 e     Investment Banking     No       14 f     Financial Markets Trading     No       14 g     Securities Services/Custody     No       14 h     Broker/Dealer     No       14 i     Multilateral Development Bank     No       14 j     Wealth Management     No       14 k     Other (please explain)	
14 f     Financial Markets Trading     No       14 g     Securities Services/Custody     No       14 h     Broker/Dealer     No       14 i     Multilateral Development Bank     No       14 j     Wealth Management     No       14 k     Other (please explain)	
14 g     Securities Services/Custody     No       14 h     Broker/Dealer     No       14 i     Multilateral Development Bank     No       14 j     Wealth Management     No       14 k     Other (please explain)	
14 g     Securities Services/Custody     No       14 h     Broker/Dealer     No       14 i     Multilateral Development Bank     No       14 j     Wealth Management     No       14 k     Other (please explain)	
14 h     Broker/Dealer     No       14 i     Multilateral Development Bank     No       14 j     Wealth Management     No       14 k     Other (please explain)	
14 i     Multilateral Development Bank     No       14 j     Wealth Management     No       14 k     Other (please explain)	
14 j Wealth Management No 14 k Other (please explain)	
14 k Other (please explain)	
15 Does the Entity have a significant (10% or more) portfolio	
of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	
If Y, provide the top five countries where the non-resident customers are located.  Iran 63%, UK 13%, EU 10%	
16 Select the closest value:	
16 a Number of employees 1-50	
16 b Total Assets Between \$100 and \$500 million	
17 Confirm that all responses provided in the above Section	
are representative of all the LE's branches.	
17 a If N, clarify which questions the difference/s relate to	
and the branch/es that this applies to.	
If appropriate, provide any additional information/context to the answers in this section.	
2. PRODUCTS & SERVICES	
19 Does the Entity offer the following products and services:	
19 a Correspondent Banking Yes	
19 a1 If Y	
19 a1a Does the Entity offer Correspondent Banking services to domestic banks?	
19 a1b Does the Entity allow domestic bank clients to 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	
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?	
19 a1g Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	
19 a1h Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
19 a1h1 MSBs No	
19 a1h2 MVTSs No	

19 a1i	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	No
	MSBs /MVTSs/PSPs?	
		N.
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	No
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No
19 f	International Cash Letter	No
	Low Price Securities	
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
		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)	
	eCommerce Platforms	
19 i4		
19 i5	Other - Please explain	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	No
	Stored Value Instruments	No No
19 m		
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
19 p	For each of the following please state whether you	
	offer the service to walk-in customers and if so, the	
	applicable level of due diligence:	
19 p1	Check cashing service	No
		INO
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	Yes
19 p2a	If yes, state the applicable level of due diligence	Due Diligence
19 p3	Foreign currency conversion	No .
19 p3a	If yes, state the applicable level of due diligence	
		N-
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	
	If you offer other services to walk-in customers	
19 p4a		
19 p4a	If you offer other services to walk-in customers please provide more detail here, including	N/A
19 p4a	If you offer other services to walk-in customers	
19 p4a	If you offer other services to walk-in customers please provide more detail here, including	
19 p4a 19 p5	If you offer other services to walk-in customers please provide more detail here, including	
19 p4a	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	
19 p4a 19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	
19 p4a 19 p5	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	N/A
19 p4a 19 p5	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	N/A
19 p4a 19 p5	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)	N/A
19 p4a 19 p5	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	N/A
19 p4a 19 p5 19 q	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.	N/A
19 p4a 19 p5	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	N/A
19 p4a 19 p5 19 q	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.	N/A
19 p4a 19 p5 19 q	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	N/A
19 p4a 19 p5 19 q	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	N/A
19 p4a 19 p5 19 q 20 20 a	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
19 p4a 19 p5 19 q	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.	N/A
19 p4a 19 p5 19 q 20 20 a	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
19 p4a 19 p5 19 q 20 20 a	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
19 p4a 19 p5 19 q 20 20 a	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
19 p4a 19 p5 19 q 20 20 a	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
19 p4a 19 p5 19 q 20 20 a	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
19 p4a 19 p5 19 q 20 20 a	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.	N/A
19 p4a 19 p5 19 q 20 20 a	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.	N/A
19 p4a 19 p5 19 q 20 20 a	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.	N/A
19 p4a 19 p5 19 q 20 20 a 21	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.	N/A  N/A  No branches
19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT 22	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference's relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.	N/A N/A No branches  Yes
19 p4a 19 p5 19 q 20 20 a 21	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.	N/A  N/A  No branches
19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT 22	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference's relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.	N/A N/A No branches  Yes
19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c	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.  FF & 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	N/A  N/A  No branches  Yes  Yes  Yes  Yes
19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d	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.  FE 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	N/A  N/A  No branches  Yes Yes Yes Yes Yes No
19 p4a 19 p5 19 q 20 20 a 21 21 22 a 22 b 22 c 22 d 22 e	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  FF & 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	N/A  N/A  No branches  Yes Yes Yes Yes No by
19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT 22 a 22 b 22 c 22 c 22 d 22 e 22 f	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference's relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  F. & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD	N/A  N/A  No branches  Yes Yes Yes Yes No Yes No Yes
19 p4a 19 p5 19 q 20 20 a 21 21 22 a 22 b 22 c 22 d 22 e	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  FF & 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	N/A  N/A  No branches  Yes Yes Yes Yes No by
19 p4a 19 p5 19 q 20 20 a 21 21 22 a 22 b 22 c 22 d 22 c 22 d 22 f 22 g	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference's relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  F. & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD	N/A  No branches  Yes Yes Yes Yes Yes Yes Yes No Yes Yes Yes
19 p4a 19 p5 19 q 20 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  F & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing  Periodic Review	N/A  N/A  No branches  Yes Yes Yes Yes Yes Yes Yes No Yes Yes No Yes Yes
19 p4a 19 p5 19 q 20 20 a 21 22 a 22 b 22 c 22 c 22 d 22 e 22 f 22 g 22 h 22 i	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing  Periodic Review  Policies and Procedures	N/A  No branches  Yes Yes Yes Yes Yes Yes Yes Yes Yes
19 p4a 19 p5 19 q 20 20 a 21 21 22 a 22 b 22 c 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 j	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.  If & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing  Periodic Review  Policies and Procedures  PEP Screening	N/A  N/A  No branches  Yes  Yes  Yes  Yes  Yes  Yes  Yes
19 p4a 19 p5 19 q 20 20 a 21 22 a 22 b 22 c 22 d 22 c 22 d 22 c 22 f 22 p 22 h 22 j 22 k	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  F & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership  Cash Reporting  CDD  Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment	N/A  N/A  No branches  Yes  Yes  Yes  Yes  Yes  Yes  No  Yes  Yes  No  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye
19 p4a 19 p5 19 q 20 20 a 21 21 22 a 22 b 22 c 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 j	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.  If & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing  Periodic Review  Policies and Procedures  PEP Screening	N/A  N/A  No branches  Yes  Yes  Yes  Yes  Yes  Yes  Yes

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,	
23		1-10
	CTF & Sanctions Compliance Department?	
24	Is the Entity's AML, CTF & Sanctions policy approved at	
	least annually by the Board or equivalent Senior	Yes
	Management Committee? If N, describe your practice in	
	Question 29.	
25	Does the Board receive, assess, and challenge regular	
	reporting on the status of the AML, CTF, & Sanctions	Yes
	programme?	
26	Does the Entity use third parties to carry out any	
	components of its AML, CTF & Sanctions programme?	No
	1 - 1	
26 a	If Y, provide further details	
	December and the boson of the below of the Co.	
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section	No branches
	are representative of all the LE's branches	No Branchiso
28 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context	
	to the answers in this section.	
4. ANTI BE	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
50	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	Yes
	sets minimum ABC standards?	<u></u>
32	Has the Entity appointed a designated officer or officers	
	with sufficient experience/expertise responsible for	Yes
	coordinating the ABC programme?	
33	Does the Entity have adequate staff with appropriate	
		V
	Hevels of experience/expertise to implement the ARC:	Yes
	levels of experience/expertise to implement the ABC	Yes
24	programme?	
34	programme? Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:	
	programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This	
35	brogramme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or	Both joint ventures and third parties acting on behalf of the Entity
35	brogramme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	
35	brogramme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or	Both joint ventures and third parties acting on behalf of the Entity
35	brogramme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage	Both joint ventures and third parties acting on behalf of the Entity
35	brogramme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding	Both joint ventures and third parties acting on behalf of the Entity  Yes
35 35 a	brogramme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding	Both joint ventures and third parties acting on behalf of the Entity
35 a 35 b	brogramme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?	Both joint ventures and third parties acting on behalf of the Entity  Yes
35 35 a	programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of	Both joint ventures and third parties acting on behalf of the Entity  Yes
35 a 35 b	brogramme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy	Both joint ventures and third parties acting on behalf of the Entity  Yes
35 a 35 b	programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of	Both joint ventures and third parties acting on behalf of the Entity  Yes  Yes
35 a 35 b	brogramme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy	Both joint ventures and third parties acting on behalf of the Entity  Yes  Yes
35 a 35 b 35 c	brogramme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy	Post joint ventures and third parties acting on behalf of the Entity  Yes  Yes
35 a 35 b	brogramme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Both joint ventures and third parties acting on behalf of the Entity  Yes  Yes
35 35 a 35 b 35 c 36	brogramme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Post joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes
35 a 35 b 35 c	brogramme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular	Post joint ventures and third parties acting on behalf of the Entity  Yes  Yes
35 a 35 b 35 c 36 37	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Post joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes
35 35 a 35 b 35 c 36	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment	Post joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes
35 a 35 b 35 c 36 37	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Post joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes
35 a 35 b 35 c 36 37	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment	Post joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes
35 a 35 a 35 b 35 c 36 37 38	brogramme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Post joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes
35 a 35 b 35 c 36 37	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Post joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes
35 a 35 a 35 b 35 c 36 37 38	brogramme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Post joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes
35 a 35 a 35 b 35 c 36 37 38	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Post joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes
35 a 35 a 35 b 35 c 36 37 38	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Post joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes
35 a 35 a 35 b 35 c 36 37 38	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Post joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes
35 a 35 a 35 c 36 37 38 38 a	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.	Post joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes  Yes  Yes
35 a 35 a 35 c 36 37 38 38 a	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the	Post joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes
35 a 35 a 35 b 35 c 36 37 38 38 a 39	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Post joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes  Yes  Yes
35 a 35 a 35 c 36 37 38 38 a	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk	Post joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes  Yes  Yes
35 35 a 35 b 35 c 36 37 38 38 a 39 40	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Both joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye
35 a 35 a 35 b 35 c 36 37 38 38 a 39	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Potential liability created by intermediaries and other	Post joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes  Yes  Yes
35 a 35 a 35 a 35 a 35 a 36 37 38 38 a 39 40 40 a	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Potential liability created by intermediaries and other third-party providers as appropriate	Both joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye
35 35 a 35 b 35 c 36 37 38 38 a 39 40	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Potential liability created by intermediaries and other third-party providers as appropriate  Corruption risks associated with the countries and	Both joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye
35 a 35 a 35 a 35 a 35 a 36 37 38 38 a 39 40 40 a	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Potential liability created by intermediaries and other third-party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly	Both joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye
35 35 a 35 b 35 c 36 37 38 38 a 40 40 a 40 b	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Potential liability created by intermediaries and other third-party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Both joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye
35 a 35 a 35 a 35 a 35 a 36 37 38 38 a 39 40 40 a	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Potential liability created by intermediaries and other third-party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  Transactions, products or services, including those	Both joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye
35 35 a 35 b 35 c 36 37 38 38 a 40 40 a 40 b	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Potential liability created by intermediaries and other third-party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Both joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye
35 35 a 35 b 35 c 36 37 38 38 a 40 40 a 40 b	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Potential liability created by intermediaries and other third-party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  Transactions, products or services, including those	Both joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye
35 a 35 a 35 b 35 c 36 37 38 38 a 39 40 40 a 40 b	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Potential liability created by intermediaries and other third-party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  Transactions, products or services, including those that involve state-owned or state-controlled entities or	Both joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye
35 35 a 35 b 35 c 36 37 38 38 a 40 40 a 40 b	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Potential liability created by intermediaries and other third-party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials  Corruption risks associated with gifts and hospitality,	Both joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye
35 a 35 a 35 b 35 c 36 37 38 38 a 39 40 40 a 40 b	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Potential liability created by intermediaries and other third-party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Both joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye

		<u></u>
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	No
42 u	Third parties to which specific compliance activities	1140
	subject to ABC risk have been outsourced	Not Applicable
42 f	Non-employed workers as appropriate (contractors/consultants)	Yes
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	No
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
5. AML, C	TF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
	consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent,	
	detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least	
	annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	No
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	Yes
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes

49 i	Define the process for escalating financial crime risk	.,
	issues/potentially suspicious activity identified by	Yes
40:	employees	
49 j	Define the process, where appropriate, for terminating existing customer relationships due to	Yes
	financial crime risk	163
49 k	Define the process for exiting clients for financial	
43 K	crime reasons that applies across the entity, including	Yes
	foreign branches and affiliates	
49 I	Define the process and controls to identify and	
	handle customers that were previously exited for	V
	financial crime reasons if they seek to re-establish a	Yes
	relationship	
49 m	Outline the processes regarding screening for	
	sanctions, PEPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal	
	"watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or	
	similar document which defines a risk boundary around	Yes
	their business?	
51	Does the Entity have record retention procedures that	Yes
	comply with applicable laws?	••
51 a	If Y, what is the retention period?	
		5 years or more
		o yours or more
52	Confirm that all responses provided in the above Section	No branches
	are representative of all the LE's branches	No bialicies
52 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context	
	to the answers in this section.	
6 AMI CT	F & SANCTIONS RISK ASSESSMENT	
	R & SANCTIONS RISK ASSESSMENT  Does the Entity's AMI & CTE FWRA cover the inherent	
6. AML, CT 54	Does the Entity's AML & CTF EWRA cover the inherent	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Yes
	Does the Entity's AML & CTF EWRA cover the inherent	Yes 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 Yes Yes
54 a 54 b 54 c 54 d 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 55 a 55 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Yes Yes Yes Yes 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
54 a 54 b 54 c 54 d 55 d 55 a 55 b 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 Dilligence PEP Identification Transaction Screening	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 Transaction Screening Name Screening against Adverse Media/Negative	Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 a 54 b 54 c 54 d 55 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 a 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 c 54 d 55 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 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 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 c 54 d 55 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 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 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 c 55 c 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 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 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 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 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 c 55 f 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.	Yes
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 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.	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.	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 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
54 a 54 b 54 c 54 d 55 c 55 b 55 c 55 d 5	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 f 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	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 f 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 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 c 55 d 5	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 f 55 g 55 h 56 a  57 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	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 56 a  57 a 57 a 57 a 57 c 57 d 58 a 58 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	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 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 Governance	Yes

Sept		_ N_ 0 :	lv.
Training and Equations   Yes	58 e		
Sea the Embly Seasonore EVRA-been completed in the last Committed			
Sect 2 morths?   Feb.			YES
Section   Sect	59		Yes
was completed.  Confirm that all responses provided in the above Section no branches  or recoverable of all the LSE branches  or recoverable of all the LSE branches  and the branches that this applies to.  If appropriate, provide any additional information/context to the universe in this section.  7. KYC, CDD and EDD  7. KYC, CDD and EDD  7. KYC, CDD and EDD  8. Description of the provided any additional information/context to the universe in this section.  7. KYC, CDD and EDD  8. Description of the section of the universe of the univer	<u></u>		
Confirm that all responses provided in the above Section are representative of all the LED branches are representative of all the LED branches and the section of the confirmation of the species of the confirmation of the	59 a		
ane representative of all the LE's branches.  All Controlles		was completed.	
ane representative of all the LE's branches.  All Controlles			
ane representative of all the LE's branches.  All Controlles			
ane representative of all the LE's branches.  All Controlles	60	Confirm that all responses provided in the above Section	N. L
and the branchives that this applies to and the branchives that this applies to and the branchives that this applies to to the arrowers in this socion.  7. KYC, CDD and EDD.  7			No branches
1 If appropriate, provide any additional information/context to the answers in this section.  17. KVC, CDD and EDD  18. Dees the Entity verify the identity of the customer?  18. Dees the Entity verify the identity of the customer?  18. Dees the Entity verify the identity of the customer?  18. Dees the Entity verify the identity of the customer?  18. Dees the Entity verify the identity of the customer?  18. Dees the Entity verify the identity of the customer?  18. Dees the Entity verify the identity of the customer?  18. Dees the Entity verify the identity of the customer?  18. Dees the Entity verify the identity of the customer?  18. Dees the Entity verify the identity of the customer?  18. Dees the Entity verify the identity of the customer?  18. Dees the Entity verify the identity of the customer?  18. Dees the Entity verify the identity of the customer?  18. Dees the Entity verify the identity of the customer?  18. Dees the Entity verify the identity of the customer?  18. Dees the Entity verify the identity of the customer?  18. Dees the Entity verify the customer?  18. Dees the Entity verify the customer?  18. Dees the Entity verify the customer in the custome	60 a		
to the answers in this section.  7. KYC, CDD and EDD  82 Does the Entity verify the identity of the customer?  5 Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?  64 Which of the following does the Entity gather and retain when CDD must be completed, e.g. at the time of onboarding or within 30 days?  64 Which of the following does the Entity gather and retain when CDD must be completed, e.g. at the time of onboarding or within 30 days?  64 Expected activity  65 Lespected activity  66 Expected activity  66 Propose and nature of resistance in the set of the set of the following destrictive  66 Propose and nature of resistance in the set of the following destrictive  66 Propose and nature of resistance in the set of the following destrictive  65 Lespected activity  66 What is the Entity sminimum (towas) threshold applied to beneficial convents by lested in customers in sic classifications? Select all that apply:  67 Lespected activity activ		and the branch/es that this applies to.	
to the answers in this section.  7. KYC, CDD and EDD  82 Does the Entity verify the identity of the customer?  5 Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?  64 Which of the following does the Entity gather and retain when CDD must be completed, e.g. at the time of onboarding or within 30 days?  64 Which of the following does the Entity gather and retain when CDD must be completed, e.g. at the time of onboarding or within 30 days?  64 Expected activity  65 Lespected activity  66 Expected activity  66 Propose and nature of resistance in the set of the set of the following destrictive  66 Propose and nature of resistance in the set of the following destrictive  66 Propose and nature of resistance in the set of the following destrictive  65 Lespected activity  66 What is the Entity sminimum (towas) threshold applied to beneficial convents by lested in customers in sic classifications? Select all that apply:  67 Lespected activity activ			
to the answers in this section.  7. KYC, CDD and EDD  82 Does the Entity verify the identity of the customer?  5 Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?  64 Which of the following does the Entity gather and retain when CDD must be completed, e.g. at the time of onboarding or within 30 days?  64 Which of the following does the Entity gather and retain when CDD must be completed, e.g. at the time of onboarding or within 30 days?  64 Expected activity  65 Lespected activity  66 Expected activity  66 Propose and nature of resistance in the set of the set of the following destrictive  66 Propose and nature of resistance in the set of the following destrictive  66 Propose and nature of resistance in the set of the following destrictive  65 Lespected activity  66 What is the Entity sminimum (towas) threshold applied to beneficial convents by lested in customers in sic classifications? Select all that apply:  67 Lespected activity activ			
to the answers in this section.  7. KYC, CDD and EDD  82 Does the Entity verify the identity of the customer?  5 Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?  64 Which of the following does the Entity gather and retain when CDD must be completed, e.g. at the time of onboarding or within 30 days?  64 Which of the following does the Entity gather and retain when CDD must be completed, e.g. at the time of onboarding or within 30 days?  64 Expected activity  65 Lespected activity  66 Expected activity  66 Propose and nature of resistance in the set of the set of the following destrictive  66 Propose and nature of resistance in the set of the following destrictive  66 Propose and nature of resistance in the set of the following destrictive  65 Lespected activity  66 What is the Entity sminimum (towas) threshold applied to beneficial convents by lested in customers in sic classifications? Select all that apply:  67 Lespected activity activ			
7. KYC, CDD and EDD 2. Does the Entity verify the identity of the customer? 62. Does the Entity policies and procedures set out when CDD must be completed, og. at the time of orbitanding or within 30 days? 64. Which of the following does the Entity gather and retain when conclusions CDD? Select all that apply. 64. Which of the following does the Entity gather and retain when conclusions CDD? Select all that apply. 65. Selected activity. 66. As expected activity. 66. Product usage. 67. Source of funds. 68. As each of the following identities. 68. As each of the following identities. 68. As each of the following identities. 69. Does the due difficulties as site vials a part of your KYC process? 69. As each of the following identities. 69. As each of the following ide	61		
Does the Entity verify the identity of the customer?  Definition of the Entity sportices and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?  Which of the following does the Entity gather and retain when conducting CDD? Select all that apply.  Let a Customer identification  When conducting CDD? Select all that apply.  Ves  Let a Customer identification  Let a Customer identific		to the answers in this section.	
Does the Entity verify the identity of the customer?  Definition of the Entity sportices and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?  Which of the following does the Entity gather and retain when conducting CDD? Select all that apply.  Let a Customer identification  When conducting CDD? Select all that apply.  Ves  Let a Customer identification  Let a Customer identific			
Does the Entity verify the identity of the customer?  Definition of the Entity sportices and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?  Which of the following does the Entity gather and retain when conducting CDD? Select all that apply.  Let a Customer identification  When conducting CDD? Select all that apply.  Ves  Let a Customer identification  Let a Customer identific			
Does the Entity verify the identity of the customer?  Definition of the Entity sportices and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?  Which of the following does the Entity gather and retain when conducting CDD? Select all that apply.  Let a Customer identification  When conducting CDD? Select all that apply.  Ves  Let a Customer identification  Let a Customer identific	7. KYC. CI	DD and EDD	
Do the Entity's policies and procedures set out when CDP must be completed, e.g. at the time of onboarding or within 30 dates?  4 Which of the following does the Entity gather and retain when conducting CDD? Select at that apply.  54 B Which of the following does the Entity gather and retain when conducting CDD? Select at that apply.  55 B Whither of business/employment Ves.  56 C Nature of business/employment Ves.  56 C Nature of business/employment Ves.  56 C Product usage Ves.  56 Product usage Ves.  56 Product usage Ves.  56 Are aean of the following identified:  57 Are ultimate beneficial ownership Yes.  58 A United beneficial ownership Yes.  58 A United beneficial ownership Yes.  59 Corner retains the Complete Comple			Yes
CDD must be completed, e.g. at the time of onboarding or within 30 days?  64 Which of the following does the Entity gather and retain when conducting CDD's Select all that apply:  45 Castomer identification Yes  46 Lexicomer identification Yes  47 Lexicomer identification Yes  48 Lexicomer identification Yes  49 Lexicomer identification Yes  49 Lexicomer identification Yes  49 Lexicomer identification Yes  40 Lexicomer identification Yes  40 Lexicomer identification Yes  41 Lexicomer identification Yes  42 Lexicomer identification Yes  43 Lexicomer identification Yes  44 Lexicomer identification Yes  45 Lexicomer identification Yes  46 Lexicomer identification Yes  47 Lexicomer identification Yes  48 Lexicomer identi			
or within 30 days?  4 Which of the following does the Entity gather and retain when conducting CDD? Select at that apply:  4 Cauther destination  4 Expected activity  5 Expected activity  6 Expected activity  7 Expected activity  7 Expected			Yes
when conducting CDD? Select all that apply:  64 a Customer identification  64 b Expected activity  64 c Nature of business/employment  74 ves  64 d Ownership structure  74 ves  64 d Ownership structure  75 ves  64 d Ownership structure  76 ves  64 d Ownership structure  76 ves  64 d Ownership structure  77 ves  64 d Ownership structure  78 ves  64 d Ownership structure  79 ves  64 d Ownership structure  79 ves  64 d Ownership structure  70 ves  64 d Ownership structure  70 ves  64 d Ownership structure  70 ves  64 d Source of tunds  70 ves  64 d Source of tunds  70 ves  65 ves  66 ves  70 ve		or within 30 days?	
64 b         Customer identification         Yes           64 c         Nature of business/employment         Yes           64 d         Nourselly actuature         Yes           64 e         Product usage         Yes           64 e         Product usage         Yes           64 f         Pupose and nature of relationship         Yes           64 g         Source of funds         Yes           65 h         Are each of the following identified:         56.3           65 a         Are each of the following identified:         Yes           65 a         Are unimate beneficial owners verified?         Yes           65 b         Authorised signatives (where applicable)         Yes           65 c         Key controllers         Yes           66 d         What is the Entity's minimum (lowest) the inclusions of the process result in customers the process result in customers result in customers and customers result in customers and customers are customers and customers and customers are customers and customers are customers.         Yes           67 at         Georgraphy	64	Which of the following does the Entity gather and retain	
64 b         Expected activity         Yes           64 c         Ownership structure         Yes           64 e         Product usage         Yes           64 f         Purpose and nature of relationship         Yes           64 g         Source of unds         Yes           64 h         Source of wealth         Yes           65 A         As each of the following identified:			
84 d     Nature of business/employment     Yes       84 d     Product usage     Yes       84 f     Prupose and nature of relationship     Yes       84 g     Source of funds     Yes       84 g     Source of funds     Yes       85 a     Lithrate beneficial ownership     Yes       85 a     Are each of the following identified:     Yes       85 a     Lithrate beneficial ownership     Yes       85 a     Authorised signatories (where applicable)     Yes       85 b     Authorised signatories (where applicable)     Yes       85 d     Cher relevant parties     Yes       85 d     Other relevant parties     Yes       85 d     Other relevant parties     Yes       66 what is the Entity's minimum (rowest) threshold applied to beneficial ownership identification?     10%       10 beneficial ownership identification?     10%       67 a     If Y, what factors/criteria are used to determine the customer's receiving a risk classification?     Yes       67 a1     Product Usage     Yes       67 a2     Geography     Yes       67 a3     Business TypeIndustry     Yes       67 a4     Legal Entity type     Yes       67 a5     Adverse Information     Yes       68 a 1 If Y, is this at:     No	64 a		
84 d Ownership structure Yes 84 Product usage Yes 84 Prupose and nature of relationship Yes 84 Source of funds Yes 84 Source of wealth Yes 85 Are each of the following identified: 85 Are each of the following identified: 85 Are ultimate beneficial ownership Yes 85 Authorised signatories (where applicable) Yes 85 C Key controllers Yes 86 C Wes Head to the controller of the contr	64 b		Yes
Section   Product Usage   Yes	64 c	Nature of business/employment	Yes
Section   Sect	64 d		Yes
Source of funds	64 e		Yes
Source of wealth   Source of wealth   Yes	64 f		Yes
Source of wealth   Yes	64 g	Source of funds	Yes
Sa	64 h		Yes
Sa	65	Are each of the following identified:	
### Authorised signatories (where applicable)  ### Suthorised signatorie	65 a		Yes
Section			
Sec			Yes
Section	65 c		
What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?  Does the due diligence process result in customers receiving a risk classification?  If Y, what factors/criteria are used to determine the customer's risk classification?  If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:  If a Product Usage  For a1 Product Usage  Geography  Yes  For 32 Geography  Yes  For 33 Business Type/Industry  Yes  For 34 Legal Entity type  Yes  For 35 Adverse Information  Yes  For high risk non-individual customers, is a site visit a part of your KYC process?  For high risk non-individual customers, is a site visit a part of your KYC process?  If Y, is this at:  68 a1 Onboarding  68 B3 Trigger event  68 a2 KYC renewal  68 a3 Trigger event  68 a4 Other  69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?  Yes  69 a  If Y, is this at:  69 a  Onboarding  Yes		Other relevant parties	
to beneficial ownership identification?  For a construction of diligence process result in customers receiving a risk classification?  For a customer's risk classification? Select all that apply:  For a1 Product Usage For a2 Geography For a3 Business TypeIndustry For a4 Legal Entity type For a5 Adverse Information For a6 Other (specify)  For a6 Other (specify)  For bigh risk non-individual customers, is a site visit a part of your KYC process?  For a1 Onboarding For A1 Onboarding  For bigh risk non-individual customers, is a site visit a part of your KYC process?  For Ba If Y, is this at:  For Ba If Y, is this at:  For Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?  For Ba If Y, is this at:  For Ba If Y, is thi			
For high risk non-individual customers, is a site visit a part of your KYC process?  For high risk non-individual customers, is a site visit a part of your KYC process?  If Y, chewal  Basil  Basil Onboarding  Basil  Bas		to beneficial ownership identification?	1076
receiving a risk classification?  If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:  67 a1 Product Usage Yes  67 a2 Geography Yes  67 a3 Business Type/Industry Yes  67 a4 Legal Entity type Yes  67 a5 Adverse Information Yes  67 a6 Other (specify)  PEP Connections  68 For high risk non-individual customers, is a site visit a part of your KYC process?  68 a If Y, is this at:  68 a1 Onboarding  68 a2 KYC renewal  68 a3 Trigger event  68 a4 Other  68 a4 Other  69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?  69 a If Y, is this at:  69 a If Y, is this at:  69 a Oboarding Yes	67	Does the due diligence process result in customers	Vas
Customer's risk classification? Select all that apply:         Yes           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)         PEP Connections           68         For high risk non-individual customers, is a site visit a part of your KYC process?         No           68 a1         Onboarding         If y, is this at:           68 a2         KYC renewal         If yes, please specify "Other"           68 a4a         Other         Other           68 a4a         If yes, please specify "Other"           69         Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?         Yes           69 a         If y, is this at:         If y, is this at:           69 a         Onboarding         Yes		receiving a risk classification?	100
Product Usage   Yes	67 a		
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)         PEP Connections           68         For high risk non-individual customers, is a site visit a part of your KYC process?         No           68 a         If Y, is this at:         If Y, is this at:           68 a1         Onboarding         Onboarding           68 a2         KYC renewal         If Yes, please specify "Other"           68 a4         Other         Other           68 a4a         If yes, please specify "Other"           69         Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?         Yes           69 a         If Y, is this at:         If Y, is this at:           69 a         Onboarding         Yes			
Business Type/Industry   Yes			
67 a4 Legal Entity type Yes 67 a5 Adverse Information Yes 67 a6 Other (specify)  68 For high risk non-individual customers, is a site visit a part of your KYC process? 68 a If Y, is this at: 68 a1 Onboarding 68 a2 KYC renewal 68 a3 Trigger event 68 a4 Other 68 a5 If yes, please specify "Other"  69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?  69 a If Y, is this at: 69 a1 Onboarding Yes			
67 a5 Adverse Information Yes  Other (specify)  PEP Connections  For high risk non-individual customers, is a site visit a part of your KYC process?  68 a If Y, is this at: 68 a1 Onboarding 68 a2 KYC renewal 68 a3 Trigger event 68 a4 Other 68 a4 Other 68 a4 Other 68 a5 If yes, please specify "Other"  69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?  69 a If Y, is this at: 69 a1 Onboarding  Yes			
68 For high risk non-individual customers, is a site visit a part of your KYC process?  68 a If Y, is this at: 68 a1 Onboarding 68 a2 KYC renewal 68 a3 Trigger event 68 a4 Other 68 a4 If yes, please specify "Other"  69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?  69 a If Y, is this at: 69 a1 Onboarding Yes			
PEP Connections  PEP Connections  PEP Connections  PEP Connections  No  PEP Connections  Population of the content			Yes
68 For high risk non-individual customers, is a site visit a part of your KYC process? 68 a If Y, is this at: 68 a1 Onboarding 68 a2 KYC renewal 68 a3 Trigger event 68 a4 Other 68 a4 Other 68 a4a If yes, please specify "Other"  69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?  69 a If Y, is this at: 69 a1 Onboarding Yes	67 a6	Other (specify)	
68 For high risk non-individual customers, is a site visit a part of your KYC process? 68 a If Y, is this at: 68 a1 Onboarding 68 a2 KYC renewal 68 a3 Trigger event 68 a4 Other 68 a4 Other 68 a4a If yes, please specify "Other"  69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?  69 a If Y, is this at: 69 a1 Onboarding Yes			DED Connections
part of your KYC process?  68 a			I LE COMMODIUMS
part of your KYC process?  68 a			
part of your KYC process?  68 a	68	For high risk non-individual customers, is a site visit a	N-
68 a If Y, is this at: 68 a1 Onboarding 68 a2 KYC renewal 68 a3 Trigger event 68 a4 Other 68 a4a If yes, please specify "Other"  69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?  69 a If Y, is this at: 69 a1 Onboarding Yes	-		INO
68 a1 Onboarding 68 a2 KYC renewal 68 a3 Trigger event 68 a4 Other 68 a4a If yes, please specify "Other"  69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?  69 a If Y, is this at: 69 a1 Onboarding Yes	68 a		
68 a2 KYC renewal 68 a3 Trigger event 68 a4 Other 68 a4a If yes, please specify "Other"  69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?  69 If Y, is this at: 69 a1 Onboarding Yes	68 a1		
68 a3 Trigger event 68 a4 Other 68 a4a If yes, please specify "Other"  69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?  69 a If Y, is this at: 69 a1 Onboarding Yes	68 a2		
68 a4 Other 68 a4a If yes, please specify "Other"  69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?  69 a If Y, is this at: 69 a1 Onboarding Yes	68 a3		
69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?  69 If Y, is this at:  69 a Onboarding Yes			
69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?  69 a If Y, is this at: 69 a1 Onboarding Yes			
customers for Adverse Media/Negative News?  Yes  69 a If Y, is this at: 69 a1 Onboarding Yes		, , , , ,	
customers for Adverse Media/Negative News?  Yes  69 a If Y, is this at: 69 a1 Onboarding Yes			
customers for Adverse Media/Negative News?  Yes  69 a If Y, is this at: 69 a1 Onboarding Yes			
customers for Adverse Media/Negative News?  Yes  69 a If Y, is this at: 69 a1 Onboarding Yes		Door the Forth have a sight	
69 a         If Y, is this at:           69 a1         Onboarding           Yes	69		V
69 a1 Onboarding Yes		customers for Adverse Media/Negative News?	Yes
69 a1 Onboarding Yes	<u> </u>	If V is this at	
			V
69 a2 KYC renewal Yes			
	69 a2	∧ Y ∪ renewai	168

	<u> </u>	
69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	Manual
74	Adverse Media/Negative News?  Does the Entity have a risk based approach to screening	
71	customers and connected parties to determine whether	
	they are PEPs, or controlled by PEPs?	Yes
	and and the of or controlled by the of	
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Manual
73	Does the Entity have policies, procedures and processes	
	to review and escalate potential matches from screening	
	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	
	rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	Yes
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	
74 a4	5 years or more	
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
76	From the list below, which categories of customers or	
70	industries are subject to EDD and/or are restricted, or	
	prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Prohibited
76 b	Respondent Banks	EDD on risk-based approach
76 b1	If EDD or restricted, does the EDD assessment	EDD OIT 18x-based approach
70 51	contain the elements as set out in the Wolfsberg	Yes
	Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	Prohibited
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	Prohibited
76 i 76 j	Non-account customers Non-Government Organisations	EDD on risk-based approach EDD on risk-based approach
76 J 76 k	Non-resident customers	EDD on risk-based approach
76 I	Nuclear power	Prohibited
76 m	Payment Service Providers	EDD on risk-based approach
76 n	PEPs	EDD on risk-based approach
76 o	PEP Close Associates	EDD on risk-based approach
76 p	PEP Related	EDD on risk-based approach
76 q	Precious metals and stones	EDD on risk-based approach
76 r	Red light businesses/Adult entertainment	Prohibited
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited  EDD on risk-based approach
76 u	Travel and Tour Companies Unregulated charities	Prohibited
76 v 76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers	Prohibited
76 y	Other (specify)	
- •		
77	If restricted, provide details of the restriction	
	,	
78	Does EDD require senior business management and/or	
78	Does EDD require senior business management and/or compliance approval?	Yes

78 a	If Y indicate who provides the approval:	Both
79	Does the Entity have specific procedures for onboarding	
	entities that handle client money such as lawyers,	Yes
	accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or quality	,
	review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section	No branches
	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.	
8. MONITO	RING & REPORTING	
83	Does the Entity have risk based policies, procedures and	
	monitoring processes for the identification and reporting	Yes
	of suspicious activity?	
84	What is the method used by the Entity to monitor	Manual
04 -	transactions for suspicious activities?	
84 a	If manual or combination selected, specify what type of transactions are monitored manually	
	or transactions are monitored manually	All transactions
84 b	If automated or combination selected, are internal	
84 b1	system or vendor-sourced tools used?  If 'Vendor-sourced tool' or 'Both' selected, what is	
04 01	the name of the vendor/tool?	
	and marrie of the vortice/recorr	N/A
84 b2	When was the tool last updated?	
84 b3	When was the automated Transaction Monitoring	
85	application last calibrated?  Does the Entity have regulatory requirements to report	
03	suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and	
	processes to comply with suspicious transaction	Yes
	reporting requirements?	
86	Does the Entity have policies, procedures and processes	
	to review and escalate matters arising from the	Yes
	monitoring of customer transactions and activity?	
87	Does the Entity have a data quality management	V
	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	
55	Request For Information (RFIs) from other entities in a	Yes
	timely manner?	
89	Does the Entity have processes in place to send	
	Requests for Information (RFIs) to their customers in a	Yes
	timely manner?	
90	Confirm that all responses provided in the above Section 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	
31	to the answers in this section.	
	The second of the second of	
O DAVATE	UT TO ANCOADENCY	
	NT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
-	Transparency Stanuarus:	

	In a real real real	
93	Does the Entity have policies, procedures and processes	
	to comply with and have controls in place to ensure	
02.0	compliance with: FATF Recommendation 16	Yes
93 a 93 b	Local Regulations	Yes
	If Y, specify the regulation	ies
93 b1	ii r, specily the regulation	Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer (Regulations) 2017. Money Laundering and Terrorist Financing (Amendment) Regulations 2019. Money Laundering and Terrorist Financing (Amendment) (High-Risk Countries) Regulations 2022. Criminal Finances Act 2017. Wire Transfer Reg
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section	No branches
	are representative of all the LE's branches	THE STATION OF
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.	
40.041107		
10. SANCT	Does the Entity have a Sanctions Policy approved by	
98	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	Dath Automated and Manual
	screening?	Both Automated and Manual
102 a	If 'automated' or 'both automated and manual'	
102 of	Selected:  Are internal quotom of wonder coursed tools used?	Doth
102 a1 102 a1a	Are internal system of vendor-sourced tools used?  If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	KYC6
102 -2	When did you lost toot the effectiveness (of	
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	<1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Manual
105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its	
106 2	sanctions screening processes:  Consolidated United Nations Security Council	
106 a	Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106 b	United States Department of the Treasury's Office of	Used for screening customers and beneficial owners and for filtering transactional data
	Foreign Assets Control (OFAC)	Osea for screening customers and beneficial owners and for illetting transactional data

106 c	Office of Financial Sanctions Implementation HMT	Used for screening customers and beneficial owners and for filtering transactional data
400 -1	(OFSI)  European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 d		
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
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?	Yes
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.	
11 TRAINII	NG & 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,	
		Yes
111 d	terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture	Yes Yes
111 e 111 f	terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud	Yes
111 e 111 f 112	terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:	Yes Yes Yes
111 e 111 f 112 112 a	terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management	Yes Yes Yes Yes
111 e 111 f 112 112 a 112 b	terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence	Yes Yes Yes Yes Yes Yes
111 e 111 f 112 112 a 112 b 112 c	terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence	Yes Yes Yes Yes Yes Yes Yes Yes Yes
111 e 111 f 112 112 a 112 b 112 c 112 d	terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence	Yes Yes Yes Yes Yes Yes
111 e 111 f 112 112 a 112 b 112 c 112 d 112 e	terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific FCC activities have been outsourced	Yes Yes Yes Yes Yes Yes Yes Yes No Not Applicable
111 e 111 f 112 112 a 112 b 112 c 112 d	terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific FCC activities have	Yes Yes Yes Yes Yes Yes Yes Yes No
111 e 111 f 112 112 a 112 b 112 c 112 d 112 e	terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific FCC activities have been outsourced	Yes Yes Yes Yes Yes Yes Yes Yes No Not Applicable
111 e 111 f 112 112 a 112 b 112 c 112 d 112 e	terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants)  Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high	Yes Yes Yes Yes Yes Yes Yes No Not Applicable Yes
111 e 111 f 112 112 a 112 b 112 c 112 d 112 d 112 f 113	terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants)  Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?  Does the Entity provide customised training for AML,	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.	
12 OLIALIT	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality	
117	Assurance programme for financial crime (separate from	Yes
	the independent Audit function)?	
118	Does the Entity have a program wide risk based	
	Compliance Testing process (separate from the	Yes
	independent Audit function)?	
119	Confirm that all responses provided in the above Section	No branches
119 a	are representative of all the LE's branches  If N, clarify which questions the difference/s relate to	
119 a	and the branch/es that this applies to.	
	and the braneryes that the applies to.	
120	If appropriate, provide any additional information/context	
120	to the answers in this section.	
	to the diswers in this section.	
13. AUDIT	The tree of the tr	
121	In addition to inspections by the government	
	supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent	
	third party, or both, that assesses FCC AML, CTF, ABC,	Yes
	Fraud and Sanctions policies and practices on a regular	
	basis?	
122	How often is the Entity audited on its AML, CTF, ABC,	
	Fraud and Sanctions programme by the following:	
122 -	Internal Audit Department	Yearly
122 a		
122 b	External Third Party	Component based reviews
	External Third Party  Does the internal audit function or other independent	
122 b 123	External Third Party  Does the internal audit function or other independent third party cover the following areas:	Component based reviews
122 b	External Third Party  Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and	
122 b 123	External Third Party  Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures	Component based reviews
122 b 123 123 a	External Third Party  Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and	Component based reviews Yes
122 b 123 123 a 123 b	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies	Yes Yes
122 b 123 123 a 123 b 123 c	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management	Yes Yes Yes Yes Yes Yes
122 b 123 a 123 a 123 b 123 c 123 d 123 e 123 f	External Third Party  Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures  Enterprise Wide Risk Assessment  Governance  KYC/CDD/EDD and underlying methodologies  Name Screening & List Management  Reporting/Metrics & Management Information	Component based reviews  Yes  Yes  Yes  Yes  Yes  Yes  Yes
122 b 123 a 123 a 123 b 123 c 123 d 123 e 123 f 123 g	External Third Party  Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures  Enterprise Wide Risk Assessment  Governance  KYC/CDD/EDD and underlying methodologies  Name Screening & List Management  Reporting/Metrics & Management Information  Suspicious Activity Filing	Component based reviews  Yes  Yes  Yes  Yes  Yes  Yes  Yes
122 b 123 a 123 a 123 c 123 c 123 d 123 e 123 f 123 g 123 h	External Third Party  Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures  Enterprise Wide Risk Assessment  Governance  KYC/CDD/EDD and underlying methodologies  Name Screening & List Management  Reporting/Metrics & Management Information  Suspicious Activity Filing  Technology	Component based reviews  Yes  Yes  Yes  Yes  Yes  Yes  Yes
122 b 123 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i	External Third Party Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring	Component based reviews  Yes  Yes  Yes  Yes  Yes  Yes  Yes
122 b 123 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j	External Third Party  Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures  Enterprise Wide Risk Assessment  Governance  KYC/CDD/EDD and underlying methodologies  Name Screening & List Management  Reporting/Metrics & Management Information  Suspicious Activity Filing  Technology  Transaction Monitoring  Transaction Screening including for sanctions	Component based reviews  Yes  Yes  Yes  Yes  Yes  Yes  Yes
122 b 123 123 a 123 b 123 c 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 i 123 j	External Third Party  Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures  Enterprise Wide Risk Assessment  Governance  KYC/CDD/EDD and underlying methodologies  Name Screening & List Management  Reporting/Metrics & Management Information  Suspicious Activity Filing  Technology  Transaction Monitoring  Transaction Screening including for sanctions  Training & Education	Component based reviews  Yes  Yes  Yes  Yes  Yes  Yes  Yes
122 b 123 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j	External Third Party  Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures  Enterprise Wide Risk Assessment  Governance  KYC/CDD/EDD and underlying methodologies  Name Screening & List Management  Reporting/Metrics & Management Information  Suspicious Activity Filing  Technology  Transaction Monitoring  Transaction Screening including for sanctions	Component based reviews  Yes  Yes  Yes  Yes  Yes  Yes  Yes
122 b 123 a 123 a 123 c 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k	External Third Party  Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures  Enterprise Wide Risk Assessment  Governance  KYC/CDD/EDD and underlying methodologies  Name Screening & List Management  Reporting/Metrics & Management Information  Suspicious Activity Filing  Technology  Transaction Monitoring  Transaction Screening including for sanctions  Training & Education	Component based reviews  Yes  Yes  Yes  Yes  Yes  Yes  Yes
122 b 123 123 a 123 b 123 c 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 i 123 j	External Third Party  Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures  Enterprise Wide Risk Assessment  Governance  KYC/CDD/EDD and underlying methodologies  Name Screening & List Management  Reporting/Metrics & Management Information  Suspicious Activity Filing  Technology  Transaction Monitoring  Transaction Screening including for sanctions  Training & Education	Component based reviews  Yes  Yes  Yes  Yes  Yes  Yes  Yes
122 b 123 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 i 123 i 123 i 123 i 123 i	External Third Party Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify)	Component based reviews  Yes  Yes  Yes  Yes  Yes  Yes  Yes
122 b 123 a 123 a 123 c 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k	External Third Party  Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures  Enterprise Wide Risk Assessment  Governance  KYC/CDD/EDD and underlying methodologies  Name Screening & List Management  Reporting/Metrics & Management Information  Suspicious Activity Filing  Technology  Transaction Monitoring  Transaction Screening including for sanctions  Training & Education  Other (specify)  Are adverse findings from internal & external audit	Component based reviews  Yes  Yes  Yes  Yes  Yes  Yes  Yes
122 b 123 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 i 123 i 123 i 123 i 123 i	External Third Party Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify)	Component based reviews  Yes  Yes  Yes  Yes  Yes  Yes  Yes
122 b 123 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 i 123 i 123 i 123 i 123 i	External Third Party  Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures  Enterprise Wide Risk Assessment  Governance  KYC/CDD/EDD and underlying methodologies  Name Screening & List Management  Reporting/Metrics & Management Information  Suspicious Activity Filing  Technology  Transaction Monitoring  Transaction Screening including for sanctions  Training & Education  Other (specify)  Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  Confirm that all responses provided in the above section	Component based reviews  Yes  Yes  Yes  Yes  Yes  Yes  Yes
122 b 123 a 123 a 123 b 123 c 123 c 123 g 123 f 123 g 123 h 123 i 123 i 123 i 123 i 123 t	External Third Party  Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures  Enterprise Wide Risk Assessment  Governance  KYC/CDD/EDD and underlying methodologies  Name Screening & List Management  Reporting/Metrics & Management Information  Suspicious Activity Filing  Technology  Transaction Monitoring  Transaction Screening including for sanctions  Training & Education  Other (specify)  Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  Confirm that all responses provided in the above section are representative of all the LE's branches	Component based reviews  Yes  Yes  Yes  Yes  Yes  Yes  Yes
122 b 123 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 i 123 i 123 i 123 i 123 i 123 l	External Third Party Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify)  Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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	Component based reviews  Yes  Yes  Yes  Yes  Yes  Yes  Yes
122 b 123 a 123 a 123 b 123 c 123 c 123 g 123 f 123 g 123 h 123 i 123 i 123 i 123 i 123 t	External Third Party  Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures  Enterprise Wide Risk Assessment  Governance  KYC/CDD/EDD and underlying methodologies  Name Screening & List Management  Reporting/Metrics & Management Information  Suspicious Activity Filing  Technology  Transaction Monitoring  Transaction Screening including for sanctions  Training & Education  Other (specify)  Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  Confirm that all responses provided in the above section are representative of all the LE's branches	Component based reviews  Yes  Yes  Yes  Yes  Yes  Yes  Yes
122 b 123 a 123 a 123 c 123 c 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 i 123 i 123 i 124	External Third Party Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify)  Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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	Component based reviews  Yes  Yes  Yes  Yes  Yes  Yes  Yes
122 b 123 123 a 123 a 123 b 123 c 123 d 123 e 123 f 123 j 123 i 123 i 123 i 123 i 123 i 123 b 123 i 123 c 123 d 12	External Third Party Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify)  Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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.	Component based reviews  Yes  Yes  Yes  Yes  Yes  Yes  Yes
122 b 123 a 123 a 123 b 123 c 123 c 123 g 123 f 123 g 123 h 123 i 123 i 123 i 123 i 123 t	External Third Party  Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures  Enterprise Wide Risk Assessment  Governance  KYC/CDD/EDD and underlying methodologies  Name Screening & List Management  Reporting/Metrics & Management Information  Suspicious Activity Filing  Technology  Transaction Monitoring  Transaction Screening including for sanctions  Training & Education  Other (specify)  Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  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.	Component based reviews  Yes  Yes  Yes  Yes  Yes  Yes  Yes
122 b 123 123 a 123 a 123 b 123 c 123 d 123 e 123 f 123 j 123 i 123 i 123 i 123 i 123 i 123 b 123 i 123 c 123 d 12	External Third Party Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify)  Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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.	Component based reviews  Yes  Yes  Yes  Yes  Yes  Yes  Yes
122 b 123 123 a 123 a 123 b 123 c 123 d 123 e 123 f 123 j 123 i 123 i 123 i 123 i 123 i 123 b 123 i 123 c 123 d 12	External Third Party  Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures  Enterprise Wide Risk Assessment  Governance  KYC/CDD/EDD and underlying methodologies  Name Screening & List Management  Reporting/Metrics & Management Information  Suspicious Activity Filing  Technology  Transaction Monitoring  Transaction Screening including for sanctions  Training & Education  Other (specify)  Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  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.	Component based reviews  Yes  Yes  Yes  Yes  Yes  Yes  Yes
122 b 123 123 a 123 a 123 b 123 c 123 d 123 e 123 f 123 j 123 i 123 i 123 i 123 i 123 i 123 b 123 i 123 c 123 d 12	External Third Party  Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures  Enterprise Wide Risk Assessment  Governance  KYC/CDD/EDD and underlying methodologies  Name Screening & List Management  Reporting/Metrics & Management Information  Suspicious Activity Filing  Technology  Transaction Monitoring  Transaction Screening including for sanctions  Training & Education  Other (specify)  Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  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.	Component based reviews  Yes  Yes  Yes  Yes  Yes  Yes  Yes
122 b 123 123 a 123 a 123 b 123 c 123 d 123 e 123 f 123 j 123 i 123 i 123 i 123 i 123 i 123 b 123 i 123 c 123 d 12	External Third Party Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify)  Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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.	Component based reviews  Yes  Yes  Yes  Yes  Yes  Yes  Yes
122 b 123 a 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 j 123 j 123 j 123 k 123 l	External Third Party Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify)  Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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.	Ves Yes Yes Yes Yes Yes Yes Yes Yes Yes Y
122 b 123 a 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 i 123 i 125 a 126 127	External Third Party  Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures  Enterprise Wide Risk Assessment  Governance  KYC/CDD/EDD and underlying methodologies  Name Screening & List Management  Reporting/Metrics & Management Information  Suspicious Activity Filing  Technology  Transaction Monitoring  Transaction Screening including for sanctions  Training & Education  Other (specify)  Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  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.	Component based reviews  Yes  Yes  Yes  Yes  Yes  Yes  Yes
122 b 123 a 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 l 124 125 126	External Third Party  Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures  Enterprise Wide Risk Assessment  Governance  KYC/CDD/EDD and underlying methodologies  Name Screening & List Management  Reporting/Metrics & Management Information  Suspicious Activity Filing  Technology  Transaction Monitoring  Transaction Screening including for sanctions  Training & Education  Other (specify)  Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  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.	Ves Yes Yes Yes Yes Yes Yes Yes Yes Yes Y

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.	

## **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)

\_\_Bank Saderat PLC \_\_\_\_\_\_(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.

\_Mr Ahmad Moradi (Head of Operations) \_ 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, \_Mrs Adwoa Philipowitz\_\_\_\_\_\_\_(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.

14/10/2024 (Signature & Date)

14/10/2024 (Signature & Date)