## the Wolfsberg Group

Financial Institution Name: Location (Country) :

CECABANK S.A. MADRID, SPAIN

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.

Full Legal Name  CECABANK S.A.  ALCALA 27, MADRID, LYBEAN LIVER moders of portuge	Answer	orially different than its Entity Head Office, a separate questionnaire can be completed  No # Question
Full Lagal Name  CECABANK S.A.  2 Append a list of foreign branches which are covered by this questionnaire  Full Lagal (Registered) Address  ALCALA 27, MADRID, SPAIN, 28014.  4 Full Primary Business Address (if different from above)  N/A  5 Date of Entity incorporation/establishment  12/11/2012  6 Select type of ownership and append an ownership chart if available  6 Publicy Traded (25% of shares publicly traded)  6 If Y, indicate the exchange traded on and ticker symbol  If Y, indicate the exchange traded on and ticker symbol  N/A  6 b Maember Owned/Mutual  No  6 c Coovernment or State Cowned by 25% or more  No  6 d Privately Owned  If Y, provide drails of shareholders or ultimate  beneficial owners with a holding of 10% or more  beneficial owners with a holding of 10% or more  Confederación Española de Cajas de Ahorros (89,08%)  7 % of the Entity's total shares composed of bearer shares  0%  8 Does the Entity, or any of its branches, operate under an Othshore Banking License (OBL)?  8 If Y, provide the name of the relovant branch'es which operate under an Othshore Banking License (OBL)?  8 Does the Bank have a Virtual Bank License or provide services only through online chamnels?  NAME Opiniany tinancial regulator/supervisory authority  Bank of Spain and SEPBLAC	Allower	
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11 Provide Legal Entity Identifier (LEI) if available	LAC	
549300CQ9NLEHMRCU505	505	Provide Legal Entity Identifier (LEI) if available
Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)  Ultimate parent is CECA - Confederación Española de Cajas de Ahorro	· Confederación Española de Cajas de Ahorro	
Jurisdiction of licensing authority and regulator of ultimate parent  Spain		parent
14 Select the business areas applicable to the Entity		
14 a Retail Banking Yes		Retail Banking

14 b	Private Banking	No
14 c		No
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	Yes
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	
	Cition (produce or prainty)	Treasury management and banking services (payment methods, discount, clearing and payment systems, etc)
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)	No
15 a	If Y, provide the top five countries where the non-resident customers are located.	N/A
16	Select the closest value:	
		201-500
16 a	Number of employees	1 111
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
18	If appropriate, provide any additional information/context to the answers in this section.	N/A
2 DPODII	CTS & SERVICES	
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	Yes
		153
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	Yes
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	Yes
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Yes
19 a1e	Does the Entity allow downstream relationships with foreign banks?	Yes
19 a1f	Does the Entity have processes and procedures in	Yes
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	Yes
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	No
19 a1h2		No
19 a1h3		No No
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19 a1i	Does the Entity have processes and procedures in	
	place to identify downstream relationships with MSBs	Yes
	/MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	Yes
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	Yes
19 e	Hold Mail	No
19 f	International Cash Letter	Yes
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then	
	offer third party payment services to their customers?	No
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	N/A
19 i3	Virtual Asset Service Providers (VASPs)	N/A
19 i4	eCommerce Platforms	N/A
		IVA
19 i5	Other - Please explain	
		L
		N/A
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	Yes
19 m	Stored Value Instruments	No
19 n	Trade Finance	No
19 o	Virtual Assets	No
19 p	For each of the following please state whether you offer	
10 P	the service to walk-in customers and if so, the applicable	
	level of due diligence:	
19 p1	Check cashing service	No No
19 p1a	If yes, state the applicable level of due diligence	N/A
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	N/A
	Foreign currency conversion	Yes
19 p3		
19 p3a	If yes, state the applicable level of due diligence	Due Diligence
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	N/A
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40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials  40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political Yes	40 a	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	
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40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political Yes	40 a 40 b	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	Yes
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	40 a 40 b	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	Yes
contributions	40 a 40 b	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,	Yes Yes
	40 a 40 b	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, hiring/internships, charitable donations and political	Yes Yes

40 e	Changes in business activities that may materially	Yes
	increase the Entity's corruption risk	165
41	Does the Entity's internal audit function or other	
	independent third party cover ABC Policies and	Yes
	Procedures?	
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	Yes
42 e	Third parties to which specific compliance activities	
0	subject to ABC risk have been outsourced	Yes
42 f	Non-employed workers as appropriate	
	(contractors/consultants)	Yes
43	Does the Entity provide ABC training that is targeted to	
	specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and	
-	the branch/es that this applies to.	
		N/A
45	If appropriate, provide any additional information/context to	
	the answers in this section.	l
		N/A
E ABEL O	CTF & 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	Yes
	annually?	Yes
48	annually? Has the Entity chosen to compare its policies and	Yes
	annually? Has the Entity chosen to compare its policies and procedures against:	
48 a	annually?  Has the Entity chosen to compare its policies and procedures against:  U.S. Standards	No
48 a 48 a1	annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results?	No N/A
48 a 48 a1 48 b	annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards	No N/A Yes
48 a 48 a1 48 b 48 b1	annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	No N/A
48 a 48 a1 48 b 48 b1 49	annually?  Has the Entity chosen to compare its policies and procedures against:  U.S. Standards  If Y, does the Entity retain a record of the results?  EU Standards  If Y, does the Entity retain a record of the results?  Does the Entity have policies and procedures that:	No N/A Yes
48 a 48 a1 48 b 48 b1	annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and	No N/A Yes Yes
48 a 48 a1 48 b 48 b1 49	annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts	No N/A Yes
48 a 48 a1 48 b 48 b1 49	annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for	No N/A Yes Yes
48 a 48 a1 48 b 48 b1 49 49 a	annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	No N/A Yes Yes
48 a 48 a1 48 b 48 b1 49	annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking	No N/A Yes Yes Yes
48 a 48 a1 48 b 48 b1 49 49 a 49 b	annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unilicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks	No N/A Yes Yes Yes Yes
48 a 48 a1 48 b 48 b1 49 49 a 49 b	annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks	No N/A Yes Yes Yes
48 a 48 a1 48 b 48 b1 49 49 a 49 b	annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services	No N/A Yes Yes Yes Yes Yes
48 a 48 a1 48 b 48 b1 49 49 a 49 b 49 c 49 d 49 e	annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks	No N/A Yes Yes Yes Yes
48 a 48 a1 48 b 48 b1 49 49 a 49 b	annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dopening and keeping of accounts for Section 311	No N/A Yes Yes Yes Yes Yes Yes Yes Yes
48 a 48 a1 48 b 48 b1 49 a 49 c 49 c 49 d 49 e	annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities	No N/A Yes Yes Yes Yes Yes
48 a 48 a1 48 b 48 b1 49 49 a 49 b 49 c 49 d 49 e	annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of	No N/A Yes Yes Yes Yes Yes Yes Yes Yes
48 a 48 a1 48 b 48 b1 49 a 49 c 49 c 49 d 49 e	annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities	No N/A Yes Yes Yes Yes Yes Yes Yes Yes Yes
48 a 48 a1 48 b 48 b1 49 a 49 c 49 c 49 d 49 e	annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of	No N/A Yes Yes Yes Yes Yes Yes Yes Yes
48 a 48 a1 48 b 48 b1 49 a 49 c 49 c 49 d 49 e	annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges	No N/A Yes Yes Yes Yes Yes Yes Yes Yes Yes
48 a 48 a1 48 b 48 b1 49 a 49 c 49 c 49 d 49 e	annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with other entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money	No N/A Yes Yes Yes Yes Yes Yes Yes Yes Yes
48 a 48 a1 48 b 48 b1 49 a 49 c 49 d 49 e 49 f	annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Assess the risks of relationships with domestic and	No N/A Yes
48 a 48 a1 48 b 48 b1 49 a 49 a 49 c 49 d 49 e 49 f 49 g	annually?  Has the Entity chosen to compare its policies and procedures against:  U.S. Standards  If Y, does the Entity retain a record of the results?  EU Standards  If Y, does the Entity retain a record of the results?  Does the Entity have policies and procedures that:  Prohibit the opening and keeping of anonymous and fictitious named accounts  Prohibit the opening and keeping of accounts for unilcensed banks and/or NBFIs  Prohibit dealing with other entities that provide banking services to unlicensed banks  Prohibit accounts/relationships with shell banks  Prohibit dealing with another entity that provides services to shell banks  Prohibit opening and keeping of accounts for Section 311 designated entities  Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	No N/A Yes

49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
49 I	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes
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 their business?	Yes
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	5 years or more
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
53	If appropriate, provide any additional information/context to the answers in this section.	N/A
6. AML. CT	TF & SANCTIONS RISK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the inherent	
	risk components detailed below:	
54 a	Client	Yes
54 b	Product	Yes
54 c		
	Channel	Yes
54 d	Geography	Yes
55	Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes
55 55 a	Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring	Yes Yes
55 a 55 b	Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Yes Yes
55 a 55 b 55 c	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
55 a 55 b 55 c 55 d	Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	Yes Yes Yes
55 a 55 b 55 c 55 d 55 e	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 Yes Yes Yes Yes Yes Yes Yes
55 a 55 b 55 c 55 d 55 e 55 f	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
55 a 55 b 55 c 55 d 55 e 55 f 55 g	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
55 a 55 b 55 c 55 d 55 e 55 f	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	Yes
55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	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	Yes
55 a 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	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
55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57	Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
55 a 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	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
55 a 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57	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
55 a 55 a 55 b 55 c 55 d 55 e  55 f 55 g 55 h 56  56 a  57 a 57 c	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
55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 a 57 c 57 d	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
55 a 55 a 55 b 55 c 55 d 55 e  55 f 55 g 55 h 56 56 a  57 a 57 b 57 c 57 d 58	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
55 a 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57 a 57 a 57 c 57 d 58 58 a	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
55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 a 57 c 57 d 58 a 58 b	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
55 a 55 a 55 b 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 a 57 a 57 b 57 c 57 d 58 a 58 a 58 b 58 c	Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance List Management	Yes
55 a 55 a 55 b 55 c 55 d 55 c 55 d 55 f 55 g 55 h 56 a 57 a 57 a 57 b 57 c 57 d 58 a 58 b	Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes

58 e Name Screening Yes 58 1 Transaction Screening Yes 59 1 As the Entity Sanctions EWRA been completed in the last 12 months? 59 a If N, provide the date when the last Sanctions EWRA was completed.  N/A  60 Confirm that all responses provided in the above Section are representative of all the LE's branches 60 a If N, clarify which questions the difference's relate to and the branch's that this applies to.  N/A  61 If appropriate, provide any additional information/context to the answers in this section.  N/A  61 If appropriate, provide any additional information/context to the answers in this section.  N/A  62 Does the Entity verify the identity of the customer? 63 Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?  64 Which of the following does the Entity gather and retain when conducting ODD? Select all that apply: 64 a Customer identification Yes 64 b Expected activity Yes 64 c Nature of business/employment Yes 64 d Ownership structure Yes 64 e Product usage Yes 64 process and nature of relationship Yes 65 Are each of the following identified:  65 a Ultimate beneficial ownership 7 Yes 65 b Are oach of the following identified: 66 What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? 67 a Ustomer identification? 67 (Does the Entity's minimum (lowest) threshold applied to beneficial ownership identification? 68 (Does the Entity's minimum (lowest) threshold applied to beneficial ownership identification? 69 (Does the due diligence process result in customers receiving a risk classification? 7 (Yes 60 (Does the Entity's minimum (lowest) threshold applied to beneficial ownership identification? 7 (Yes 60 (Does the Entity's minimum (lowest) threshold applied to beneficial ownership identification? 8 (Processional and the process result in customers receiving a risk classification? 8 (Processional and the process result in customers receiving a risk classification? 8 (Processional and Processional	
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18 12 months?  If N, provide the date when the last Sanctions EWRA was completed.  N/A  18 N, provide the date when the last Sanctions EWRA was completed.  N/A  Confirm that all responses provided in the above Section are representative of all the LE's branches  19 A If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  N/A  19 A If appropriate, provide any additional information/context to the answers in this section.  N/A  7. KYC, CDD and EDD  62 Does the Entity verify the identity of the customer?  63 Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within Ves 30 days?  64 Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:  64 Customer identification  65 Expected activity  64 Expected activity  65 Expected activity  66 Nature of business/employment  7 Ves  66 Ownership structure  7 Ves  67 Ownership structure  7 Ves  68 Ownership structure  7 Ves  69 Ownership structure  7 Ves  69 Ownership structure  7 Ves  69 Ownership structure  69 Source of funds  7 Ves  69 Ownership structure  7 Ves  69 Ownership structure  7 Ves  69 Ownership structure  80 Ownership structure  80 Ownership structure  9 Ves  60 Ownership structure  9 Ves  61 Ownership structure  9 Ves  62 Ownership structure  9 Ves  63 Ownership structure  9 Ves  64 Ownership structure  9 Ves  65 Ownership structure  9 Ves  66 Ownership structure  9 Ves  67 Ownership structure  9 Ves  68 Ownership structure  9 Ves  69 Ownership structure  9 Ves  60 Ownership structure  9 Ves  61 Ownership structure  9 Ves  62 Ownership structure  9 Ves  63 Ownership structure  9 Ves  64 Ownership structure  9 Ves  65 Ownership structure  9 Ves  66 Ownership structure  9 Ves	
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60 Confirm that all responses provided in the above Section are representative of all the LE's branches  60 a If N, clarify which questions the difference's relate to and the branch'es that this applies to.  N/A  61 If appropriate, provide any additional information/context to the answers in this section.  N/A  7. KYC, CDD and EDD  62 Does the Entity verify the identity of the customer? Ves  63 Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within Yes  30 days?  64 Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:  64 a Customer identification Yes  64 b Expected activity Yes  64 b Expected activity Yes  64 d Ownership structure Yes  64 d Ownership structure Yes  64 d Product usage Yes  64 f Prupose and nature of relationship Yes  64 g Source of funds Yes  65 a Utilimate beneficial ownership if Yes  65 a Lather individual	
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61 If appropriate, provide any additional information/context to the answers in this section.  N/A  7. KYC, CDD and EDD  62 Does the Entity verify the identity of the customer? Yes  63 Do the Entity's policies and procedures set out when CDD must be completed, e.g., at the time of onboarding or within 30 days?  64 Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:  64 Customer identification Yes  64 Daysected activity Yes  64 Nature of business/employment Yes  64 Ownership structure Yes  64 Product usage Yes  64 Product usage Yes  64 Source of funds Yes  64 Source of wealth Yes  65 Are each of the following identified:  65 a Utilimate beneficial ownership Yes  65 Are each of the following identified:  65 a Are utilimate beneficial owners verified? Yes  65 Daysected and signatories (where applicable) Yes  66 What is the Entity's minimum (lowest) threshold applied to beneficial womership identification?  67 Does the due diligence process result in customers receiving a risk classification?  67 If y what factors/criteria are used to determine the	
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the answers in this section.  N/A  7. KYC, CDD and EDD  62	
N/A	
T. KYC, CDD and EDD	
Does the Entity verify the identity of the customer?   Yes	
Does the Entity verify the identity of the customer?   Yes	
Does the Entity verify the identity of the customer?   Yes	
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when conducting CDD? Select all that apply:  64 a Customer identification Yes  64 b Expected activity Yes  64 c Nature of business/employment Yes  64 d Ownership structure Yes  64 e Product usage Yes  64 f Purpose and nature of relationship Yes  64 g Source of funds Yes  64 h Source of wealth Yes  65 Are each of the following identified:  65 a Ultimate beneficial ownership Yes  65 a Ultimate beneficial owners verified? Yes  65 b Authorised signatories (where applicable) Yes  65 c Key controllers Yes  66 Other relevant parties Yes  67 Does the due diligence process result in customers receiving a risk classification?  67 a If Y, what factors/criteria are used to determine the	
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64 c Nature of business/employment Yes 64 d Ownership structure Yes 64 e Product usage Yes 64 f Purpose and nature of relationship Yes 64 g Source of funds Yes 64 h Source of wealth Yes 65 Are each of the following identified: 65 a Ultimate beneficial ownership Yes 65 a1 Are ultimate beneficial owners verified? Yes 65 b Authorised signatories (where applicable) Yes 65 c Key controllers Yes 66 d Other relevant parties Yes 67 a If Y, what factors/criteria are used to determine the	
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64 e Product usage Yes 64 f Purpose and nature of relationship Yes 64 g Source of funds Yes 64 h Source of wealth Yes 65 Are each of the following identified: 65 a Ultimate beneficial ownership Yes 65 at Are ultimate beneficial owners verified? Yes 65 b Authorised signatories (where applicable) Yes 65 c Key controllers Yes 65 d Other relevant parties Yes 66 What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? 67 Does the due diligence process result in customers receiving a risk classification? 67 a If Y, what factors/criteria are used to determine the	
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Source of funds   Yes	
64 h Source of wealth Yes 65 Are each of the following identified: 65 a Ultimate beneficial ownership Yes 65 a1 Are ultimate beneficial owners verified? Yes 65 b1 Authorised signatories (where applicable) Yes 65 c Key controllers Yes 65 d Other relevant parties Yes 66 What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? 67 Does the due diligence process result in customers receiving a risk classification? 67 a If Y, what factors/criteria are used to determine the	
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65 d Other relevant parties Yes 66 What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? 67 Does the due diligence process result in customers receiving a risk classification? 67 a If Y, what factors/criteria are used to determine the	
66 What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?  67 Does the due diligence process result in customers receiving a risk classification?  67 a If Y, what factors/criteria are used to determine the	
beneficial ownership identification?  67 Does the due diligence process result in customers receiving a risk classification?  67 a If Y, what factors/criteria are used to determine the	
67 Does the due diligence process result in customers receiving a risk classification?  67 If Y, what factors/criteria are used to determine the	
receiving a risk classification?  167 a If Y, what factors/criteria are used to determine the	
freceiving 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)	
Period of the business relationship, size of the company, number of employees, etc.	
i oned of the business relationship, size of the company, number of employees, etc.	
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	l
68 a4 Other	
66 a4a If yes, please specify "Other"	
As a wholesale bank, we offer services mainly to other financial entities, and on site vists	
regular activity.	are part of the first line
regular activity.	are part of the first line
	are part of the first line
Does the Entity have a risk based approach to screening	are part of the first line
customers for Adverse Media/Negative News? Yes	are part of the first line
	are part of the first line
69 a If Y, is this at:	are part of the first line
69 a1 Onboarding Yes	are part of the first line
69 a2 KYC renewal Yes	are part of the first line

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	Combination of automated and manual
	Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening	
	customers and connected parties to determine whether	Vec.
	they are PEPs, or controlled by PEPs?	Yes
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
71 43	What is the method used by the Entity to screen PEPs?	165
12	what is the method used by the Entity to screen PEPS?	Automated
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	V
	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	Yes
74 a3	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
		N/A
		IVA
75	Does the Entity maintain and report metrics on current and	
75	past periodic or trigger event due diligence reviews?	Yes
	past periodic or trigger event due diligence reviews?	165
76	Form the list below which sets assists of southernoon or	
76	From the list below, which categories of customers or	
	industries are subject to EDD and/or are restricted, or	
	prohibited by the Entity's FCC programme?	
76 a	prohibited by the Entity's FCC programme?  Arms, defence, military	Always subject to EDD
	Arms, defence, military	Always subject to EDD Always subject to EDD
76 b	Arms, defence, military Respondent Banks	Always subject to EDD Always subject to EDD
	Arms, defence, military Respondent Banks If EDD or restricted, does the EDD assessment contain	Always subject to EDD
76 b	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg	• •
76 b 76 b1	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Always subject to EDD Yes
76 b 76 b1	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg  Correspondent Banking Principles 2022?  Embassies/Consulates	Always subject to EDD  Yes  Do not have this category of customer or industry
76 b 76 b1 76 c 76 d	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Embassies/Consulates  Extractive industries	Always subject to EDD  Yes  Do not have this category of customer or industry  EDD on risk-based approach
76 b 76 b1 76 c 76 d 76 e	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg  Correspondent Banking Principles 2022?  Embassies/Consulates  Extractive industries  Gambling customers	Always subject to EDD  Yes  Do not have this category of customer or industry  EDD on risk-based approach  Prohibited
76 b 76 b1 76 c 76 d 76 e 76 f	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg  Correspondent Banking Principles 2022?  Embassies/Consulates  Extractive industries  Gambling customers  General Trading Companies	Always subject to EDD  Yes  Do not have this category of customer or industry  EDD on risk-based approach  Prohibited  EDD on risk-based approach
76 b 76 b1 76 c 76 d 76 e 76 f 76 g	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Embassies/Consulates  Extractive industries  Gambling customers  General Trading Companies  Marijuana-related Entities	Always subject to EDD  Yes  Do not have this category of customer or industry  EDD on risk-based approach  Prohibited  EDD on risk-based approach  Prohibited
76 b 76 b1 76 c 76 d 76 e 76 f	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg  Correspondent Banking Principles 2022?  Embassies/Consulates  Extractive industries  Gambling customers  General Trading Companies	Always subject to EDD  Yes  Do not have this category of customer or industry  EDD on risk-based approach  Prohibited  EDD on risk-based approach
76 b 76 b1 76 c 76 d 76 e 76 f 76 g	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Embassies/Consulates  Extractive industries  Gambling customers  General Trading Companies  Marijuana-related Entities	Always subject to EDD  Yes  Do not have this category of customer or industry  EDD on risk-based approach  Prohibited  EDD on risk-based approach  Prohibited
76 b 76 b1 76 c 76 d 76 e 76 f 76 g 76 h	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Embassies/Consulates  Extractive industries  Gambling customers  General Trading Companies  Marijuana-related Entities  MSB/MVTS customers	Always subject to EDD  Yes  Do not have this category of customer or industry  EDD on risk-based approach  Prohibited  EDD on risk-based approach  Prohibited  Always subject to EDD
76 b 76 c 76 d 76 e 76 f 76 g 76 h 76 i 76 i	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MS/MVTS customers Non-account customers Non-Government Organisations	Always subject to EDD  Yes  Do not have this category of customer or industry  EDD on risk-based approach  Prohibited  EDD on risk-based approach  Prohibited  Always subject to EDD  Prohibited  Always subject to EDD
76 b 76 c 76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Embassies/Consulates  Extractive industries  Gambling customers  General Trading Companies  Marijuana-related Entities  MSB/MVTS customers  Non-account customers  Non-account customers  Non-Government Organisations  Non-resident customers	Always subject to EDD  Yes  Do not have this category of customer or industry  EDD on risk-based approach  Prohibited  EDD on risk-based approach  Prohibited  Always subject to EDD  Prohibited  Always subject to EDD  EDD on risk-based approach
76 b 76 c 76 d 76 e 76 f 76 g 76 h 76 i 76 i 76 k 76 l	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Embassies/Consulates  Extractive industries  Gambling customers  General Trading Companies  Marijuana-related Entities  MSB/MVTS customers  Non-account customers  Non-Government Organisations  Non-resident customers  Non-resident customers  Nuclear power	Always subject to EDD  Yes  Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited Always subject to EDD Prohibited Always subject to EDD EDD on risk-based approach Always subject to EDD Always subject to EDD EDD on risk-based approach Always subject to EDD
76 b 76 c 76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 m	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Embassies/Consulates  Extractive industries  Gambling customers  General Trading Companies  Marijuana-related Entities  MSB/MVTS customers  Non-account customers  Non-Government Organisations  Non-resident customers  Nuclear power  Payment Service Providers	Always subject to EDD  Yes  Do not have this category of customer or industry  EDD on risk-based approach Prohibited  EDD on risk-based approach Prohibited  Always subject to EDD Prohibited  Always subject to EDD  EDD on risk-based approach Always subject to EDD  Always subject to EDD  Always subject to EDD  Always subject to EDD
76 b 76 c 76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 i 76 m 76 n	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Embassies/Consulates  Extractive industries  Gambling customers  General Trading Companies  Marijuana-related Entities  MSB/MVTS customers  Non-account customers  Non-Government Organisations  Non-resident customers  Nuclear power  Payment Service Providers  PEPs	Always subject to EDD  Yes  Do not have this category of customer or industry  EDD on risk-based approach  Prohibited  EDD on risk-based approach  Prohibited  Always subject to EDD  Prohibited  Always subject to EDD  EDD on risk-based approach  Always subject to EDD  EDD on risk-based approach  Always subject to EDD  Always subject to EDD  Always subject to EDD  Always subject to EDD
76 b 76 c 76 d 76 e 76 f 76 g 76 i 76 j 76 k 76 i 76 m 76 n 76 o	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Embassies/Consulates  Extractive industries  Gambling customers  General Trading Companies  Marijuana-related Entities  MSB/MVTS customers  Non-account customers  Non-account Organisations  Non-resident Customers  Nuclear power  Payment Service Providers  PEPS  PEP Close Associates	Always subject to EDD  Yes  Do not have this category of customer or industry  EDD on risk-based approach  Prohibited  EDD on risk-based approach  Prohibited  Always subject to EDD  Prohibited  Always subject to EDD  EDD on risk-based approach  Always subject to EDD  EDD on risk-based approach  Always subject to EDD
76 b 76 c 76 d 76 e 76 f 76 g 76 h 76 i 76 i 76 k 76 l 76 m 76 n 76 o 76 p	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-account customers Non-resident customers Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related	Always subject to EDD  Yes  Do not have this category of customer or industry  EDD on risk-based approach  Prohibited  EDD on risk-based approach  Prohibited  Always subject to EDD  Prohibited  Always subject to EDD  EDD on risk-based approach  Always subject to EDD
76 b 76 c 76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 n 76 o	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Embassies/Consulates  Extractive industries  Gambling customers  General Trading Companies  Marijuana-related Entities  MSB/MVTS customers  Non-account customers  Non-account customers  Non-resident customers  Nuclear power  Payment Service Providers  PEPS  PEP Close Associates  PEP Related  Precious metals and stones	Always subject to EDD  Yes  Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited Always subject to EDD Prohibited Always subject to EDD EDD on risk-based approach Always subject to EDD EDD on risk-based approach Always subject to EDD
76 b 76 c 76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 q	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Embassies/Consulates  Extractive industries  Gambling customers  General Trading Companies  Marijuana-related Entities  MSB/MVTS customers  Non-account customers  Non-Government Organisations  Non-resident customers  Nuclear power  Payment Service Providers  PEPS  PEP Close Associates  PEP Related  Precious metals and stones  Red light businesses/Adult entertainment	Always subject to EDD  Yes  Do not have this category of customer or industry  EDD on risk-based approach Prohibited  EDD on risk-based approach Prohibited  Always subject to EDD Prohibited  Always subject to EDD  EDD on risk-based approach Always subject to EDD  Do not have this category of customer or industry
76 b 76 c 76 d 76 e 76 f 76 g 76 h 76 i 76 i 76 k 76 i 76 m 76 n 76 o 76 p 76 q 76 r 76 s	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Embassies/Consulates  Extractive industries  Gambling customers  General Trading Companies  Marijuana-related Entities  MSB/MVTS customers  Non-account customers  Non-Government Organisations  Non-resident customers  Nuclear power  Payment Service Providers  PEPS  PEP Close Associates  PEP Related  Precious metals and stones  Red light businesses/Adult entertainment  Regulated Charities	Always subject to EDD  Yes  Do not have this category of customer or industry  EDD on risk-based approach Prohibited  EDD on risk-based approach Prohibited  Always subject to EDD  Prohibited  Always subject to EDD  Prohibited  Always subject to EDD  EDD on risk-based approach Always subject to EDD  Do not have this category of customer or industry  Always subject to EDD
76 b 76 c 76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 q	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Embassies/Consulates  Extractive industries  Gambling customers  General Trading Companies  Marijuana-related Entities  MSB/MVTS customers  Non-account customers  Non-Government Organisations  Non-resident customers  Nuclear power  Payment Service Providers  PEPS  PEP Close Associates  PEP Related  Precious metals and stones  Red light businesses/Adult entertainment	Always subject to EDD  Yes  Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited Always subject to EDD Prohibited Always subject to EDD EDD on risk-based approach Always subject to EDD Do not have this category of customer or industry Always subject to EDD Prohibited
76 b 76 c 76 d 76 e 76 f 76 g 76 h 76 i 76 i 76 k 76 i 76 m 76 n 76 o 76 p 76 q 76 r 76 s	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Embassies/Consulates  Extractive industries  Gambling customers  General Trading Companies  Marijuana-related Entities  MSB/MVTS customers  Non-account customers  Non-account customers  Non-resident customers  Nuclear power  Payment Service Providers  PEPS  PEP Close Associates  PEP Related  Precious metals and stones  Red light businesses/Adult entertainment  Regulated Charities  Shell banks  Travel and Tour Companies	Always subject to EDD  Yes  Do not have this category of customer or industry  EDD on risk-based approach Prohibited  EDD on risk-based approach Prohibited  Always subject to EDD  Prohibited  Always subject to EDD  EDD on risk-based approach Always subject to EDD  EDD on risk-based approach Always subject to EDD  Do not have this category of customer or industry  Always subject to EDD
76 b 76 c 76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 i 76 n 76 n 76 n 76 o 76 p 76 q 76 s 76 t	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Embassies/Consulates Extractive industries Gambling customers General Trading Companies  Marijuana-related Entities MSB/MVTS customers Non-account customers Non-account customers Non-foovernment Organisations Non-resident customers Nuclear power Payment Service Providers PEP PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks	Always subject to EDD  Yes  Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited Always subject to EDD Prohibited Always subject to EDD EDD on risk-based approach Always subject to EDD Do not have this category of customer or industry Always subject to EDD Prohibited
76 b 76 c 76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 h 76 i 76 n 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Embassies/Consulates  Extractive industries  Gambling customers  General Trading Companies  Marijuana-related Entities  MSB/MVTS customers  Non-account customers  Non-account customers  Non-Government Organisations  Non-resident customers  Nuclear power  Payment Service Providers  PEPs  PEP Close Associates  PEP Related  Precious metals and stones  Red light businesses/Adult entertainment  Regulated charities  Shell banks  Travel and Tour Companies  Unregulated charities	Always subject to EDD  Yes  Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited Always subject to EDD Prohibited Always subject to EDD EDD on risk-based approach Always subject to EDD EDD on risk-based approach Always subject to EDD Do not have this category of customer or industry Always subject to EDD Prohibited EDD on risk-based approach Prohibited  EDD on risk-based approach Prohibited
76 b 76 c 76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 h 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Embassies/Consulates  Extractive industries  Gambling customers  General Trading Companies  Marijuana-related Entities  MSB/MVTS customers  Non-account customers  Non-Government Organisations  Non-resident customers  Nuclear power  Payment Service Providers  PEPS  PEP Close Associates  PEP Related  Precious metals and stones  Red light businesses/Adult entertainment  Regulated charities  Shell banks  Travel and Tour Companies  Urregulated Charities  Used Car Dealers	Always subject to EDD  Yes  Do not have this category of customer or industry  EDD on risk-based approach Prohibited  EDD on risk-based approach Prohibited  Always subject to EDD Prohibited  Always subject to EDD  EDD on risk-based approach Always subject to EDD  Do not have this category of customer or industry  Always subject to EDD  Prohibited  EDD on risk-based approach Prohibited  EDD on risk-based approach Prohibited  Do not have this category of customer or industry
76 b 76 c 76 d 76 e 76 f 76 f 76 j 76 k 76 i 76 n 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 w	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Embassies/Consulates  Extractive industries  Gambling customers  General Trading Companies  Marijuana-related Entities  MSB/MVTS customers  Non-account customers  Non-Government Organisations  Non-resident customers  Nuclear power  Payment Service Providers  PEP Close Associates  PEP Related  Precious metals and stones  Red light businesses/Adult entertainment  Regulated charities  Shell banks  Travel and Tour Companies  Unregulated charities  Used Car Dealers  Virtual Asset Service Providers	Always subject to EDD  Yes  Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited Always subject to EDD Prohibited Always subject to EDD EDD on risk-based approach Always subject to EDD EDD on risk-based approach Always subject to EDD Do not have this category of customer or industry Always subject to EDD Prohibited EDD on risk-based approach
76 b 76 c 76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 h 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Embassies/Consulates  Extractive industries  Gambling customers  General Trading Companies  Marijuana-related Entities  MSB/MVTS customers  Non-account customers  Non-Government Organisations  Non-resident customers  Nuclear power  Payment Service Providers  PEPS  PEP Close Associates  PEP Related  Precious metals and stones  Red light businesses/Adult entertainment  Regulated charities  Shell banks  Travel and Tour Companies  Urregulated Charities  Used Car Dealers	Always subject to EDD  Yes  Do not have this category of customer or industry  EDD on risk-based approach Prohibited  EDD on risk-based approach Prohibited  Always subject to EDD Prohibited  Always subject to EDD  EDD on risk-based approach Always subject to EDD  Do not have this category of customer or industry  Always subject to EDD  Prohibited  EDD on risk-based approach Prohibited  EDD on risk-based approach Prohibited  Do not have this category of customer or industry
76 b 76 c 76 d 76 e 76 f 76 f 76 j 76 k 76 i 76 n 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 w	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Embassies/Consulates  Extractive industries  Gambling customers  General Trading Companies  Marijuana-related Entities  MSB/MVTS customers  Non-account customers  Non-Government Organisations  Non-resident customers  Nuclear power  Payment Service Providers  PEP Close Associates  PEP Related  Precious metals and stones  Red light businesses/Adult entertainment  Regulated charities  Shell banks  Travel and Tour Companies  Unregulated charities  Used Car Dealers  Virtual Asset Service Providers	Always subject to EDD  Yes  Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited Always subject to EDD Prohibited Always subject to EDD BDD on risk-based approach Always subject to EDD Do not have this category of customer or industry Always subject to EDD Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited Do not have this category of customer or industry Always subject to EDD Prohibited Do not have this category of customer or industry Always subject to EDD
76 b 76 c 76 d 76 e 76 f 76 f 76 j 76 k 76 i 76 n 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 w	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Embassies/Consulates  Extractive industries  Gambling customers  General Trading Companies  Marijuana-related Entities  MSB/MVTS customers  Non-account customers  Non-Government Organisations  Non-resident customers  Nuclear power  Payment Service Providers  PEP Close Associates  PEP Related  Precious metals and stones  Red light businesses/Adult entertainment  Regulated charities  Shell banks  Travel and Tour Companies  Unregulated charities  Used Car Dealers  Virtual Asset Service Providers	Always subject to EDD  Yes  Do not have this category of customer or industry  EDD on risk-based approach Prohibited  EDD on risk-based approach Prohibited  Always subject to EDD Prohibited  Always subject to EDD  EDD on risk-based approach Always subject to EDD  Do not have this category of customer or industry  Always subject to EDD  Prohibited  EDD on risk-based approach Prohibited  EDD on risk-based approach Prohibited  Do not have this category of customer or industry
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76 b 76 c 76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 n 76 n 76 n 76 o 76 q 76 r 76 s 76 t 76 s 76 t 76 s	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Embassies/Consulates  Extractive industries  Gambling customers  General Trading Companies  Marijuana-related Entities  MSB/MVTS customers  Non-account customers  Non-account customers  Non-resident customers  Nuclear power  Payment Service Providers  PEPS  PEP Close Associates  PEP Related  Precious metals and stones  Red light businesses/Adult entertainment  Regulated charities  Shell banks  Travel and Tour Companies  Used Car Dealers  Virtual Asset Service Providers  Other (specify)	Always subject to EDD  Yes  Do not have this category of customer or industry  EDD on risk-based approach  Prohibited  EDD on risk-based approach  Prohibited  Always subject to EDD  Prohibited  Always subject to EDD  EDD on risk-based approach  Always subject to EDD  Prohibited  Do not have this category of customer or industry  Always subject to EDD  Prohibited  EDD on risk-based approach  Prohibited  Do not have this category of customer or industry  Always subject to EDD  N/A
76 b 76 c 76 d 76 e 76 f 76 g 76 h 76 i 76 i 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 v 76 v 76 v 76 v 76 y	Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Embassies/Consulates  Extractive industries  Gambling customers  Gamelar Trading Companies  Marijuana-related Entities  MSB/MVTS customers  Non-account customers  Non-account customers  Non-resident customers  Nuclear power  Payment Service Providers  PEP  PEP Close Associates  PEP Related  Precious metals and stones  Red light businesses/Adult entertainment  Regulated charities  Shell banks  Travel and Tour Companies  Unregulated charities  Used Car Dealers  Virtual Asset Service Providers  Other (specify)  If restricted, provide details of the restriction	Always subject to EDD  Yes  Do not have this category of customer or industry  EDD on risk-based approach  Prohibited  EDD on risk-based approach  Prohibited  Always subject to EDD  Prohibited  Always subject to EDD  EDD on risk-based approach  Always subject to EDD  EDD on risk-based approach  Always subject to EDD  Do not have this category of customer or industry  Always subject to EDD  Prohibited  EDD on risk-based approach  Do not have this category of customer or industry  Always subject to EDD  Prohibited  Do not have this category of customer or industry  Always subject to EDD  Prohibited  Do not have this category of customer or industry  Always subject to EDD

78 a	If Y indicate who provides the approval:	Compliance
79 T	Does the Entity have specific procedures for onboarding	- Compilation
	entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Yes
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	N/A
82	If appropriate, provide any additional information/context to the answers in this section.	Q76i: We only have as non-account customers those of the currency exchange office situated in our main premises.
8. MONIT	ORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Automated
84 a	If manual or combination selected, specify what type of transactions are monitored manually	N/A
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Vendor-sourced tools
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	Net Reveal and ThetaRay
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	N/A
91	If appropriate, provide any additional information/context to the answers in this section.	N/A
9. PAYME	ENT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes

93	Does the Entity have policies, procedures and processes	
	to comply with and have controls in place to ensure	
	compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	Mainly, law 10/2010. Regulation (UE) 2015/847 is also aplicable.
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section	Yes
96 a	are representative of all the LE's branches  If N, clarify which guestions the difference/s relate to and	
	the branch/es that this applies to.	N/A
97	If appropriate, provide any additional information/context to the answers in this section.	N/A
40 OANOT	7010	
10. SANCT		
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Automated
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Net Reveal and Factiva Dow Jones
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Automated
105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its	
106 a	sanctions screening processes:  Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Office of Financial Sanctions Implementation HMT	Used for screening customers and beneficial owners and for filtering transactional data
	(OFSI)	Cook for concorning cook of the contorional owners and for intering traffocitorial data

106 d	European Union Consolidated List (EU)	Lload for according austomore and baneficial auguers and for filtering transactional data
		Used for screening customers and beneficial owners and for filtering transactional data
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)	For Q.106 section: Lists by Spain, Portugal and Luxembourg are used for screening of customers, beneficial owners and for filtering transactional data, as applicable.
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
110	If appropriate, provide any additional information/context to the answers in this section.	N/A
11. TRAINI	ING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to :	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	Yes
112 f	Non-employed workers (contractors/consultants)	Yes
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
	If Y, how frequently is training delivered?	Other
114 a		

115 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	N/A
		IN/A
116	If appropriate, provide any additional information/context to	114a: Training is delivered all staff (i) at onboarding, (ii) in case AMLCTF legal or regulatory changes/updates; (iii)
	the answers in this section.	periodically, on a risk-based approach (1-3 years) and/or, for the personnel in our branches, as required by local
		regulation.
	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality	
	Assurance programme for financial crime (separate from	Yes
118	the independent Audit function)?  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	Yes
110 -	are representative of all the LE's branches  If N, clarify which questions the difference/s relate to and	
119 a	the branch/es that this applies to.	
	the branches that this applies to.	N/A
120	If appropriate, provide any additional information/context to	
120	the answers in this section.	
	333333	N/A
13. AUDIT		
121	In addition to inspections by the government	
121	supervisors/regulators, does the Entity have an internal	
	audit function, a testing function or other independent third	Yes
	party, or both, that assesses FCC AML, CTF, ABC, Fraud	
	and Sanctions policies and practices on a regular basis?	
122	How often is the Entity audited on its AML, CTF, ABC,	
122	Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Yearly
123	Does the internal audit function or other independent third	Today
	party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and	Yes
123 b	procedures Enterprise Wide Risk Assessment	Yes
123 b	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j 123 k	Transaction Screening including for sanctions Training & Education	Yes Yes
123 K	Other (specify)	1100
1201	Cariot (opeony)	
		N/A
124	Are adverse findings from internal & external audit tracked	
	to completion and assessed for adequacy and	Yes
	completeness?	
125	Confirm that all responses provided in the above section	Yes
105 -	are representative of all the LE's branches	··
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	αιο διαποίνες απαι από αρρίτες το.	N/A
126	If appropriate, provide any additional information/context to	
120	the answers in this section.	
	and anoword in this section.	N/A
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14. FRAU		
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated team responsible for	v.
	preventing & detecting fraud?	Yes
-	<del></del>	

129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
132	If appropriate, provide any additional information/context to the answers in this section.	N/A
Declaration Statement		
Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)  Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)  CECABANK S.A. (Financial Institution name) is fully committed to the fight against financial crime and makes		
every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.		
The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.		
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.		
The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.		
The Financial Institution commits to file accurate supplemental information on a timely basis.		
I,RAFAEL LINDE CASTILLO (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,RICARDO LÓPEZ LÁZARO (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.		
(Signature & Date)		
(Signature & Date)		