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.

No #	Ouestion	Answer
	& OWNERSHIP	
1	Full Legal Name	
•	l un Eogar Namo	
		CECABANK S.A.
2	Append a list of foreign branches which are covered by	
2	this questionnaire	
	this questionnaire	PORTUGAL AND LUXEMBOURG
	Full Local (Degistered) Address	
3	Full Legal (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
		TE TILEVIE
6	Select type of ownership and append an ownership chart if	
	available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker symbol	
		N/A
		N/A
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	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	Confederación Española de Cajas de Ahorros (89,08%)
		y
<u> </u>		
7	% of the Entity's total shares composed of bearer shares	
		0%
8	Does the Entity, or any of its branches, operate under an	No
8 a	Offshore Banking License (OBL)?	
Оа	If Y, provide the name of the relevant branch/es which operate under an OBL	
	operate unuer an ODL	N/A
	Doos the Book house a Virtual Book Lineary and 1	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	no
10	Name of primary financial regulator/supervisory authority	
	2. p.mar. j. mariota regulator/outporvious autility	
		Bank of Spain and SEPBLAC
11	Provide Legal Entity Identifier (LEI) if available	
**	Trovide Legal Entity Identifier (LEI) II available	
		549300CQ9NLEHMRCU505
10	Dravida the full level name of the ultimate waves of	
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	
	dinerent from the Entity completing the DDQ)	Ultimate parent is CECA - Confederación Española de Cajas de Ahorro
		,
13	Jurisdiction of licensing authority and regulator of ultimate	
	parent	Spain
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes

	1	T.,
14 b		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)	
		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:	
16 a	Number of employees	201-500
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.	
2 DRODII	CTS & 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?	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 place to identify downstream relationships with foreign banks?	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
	1	-

19 a1i		
	Does the Entity have processes and procedures in	
	place to identify downstream relationships with MSBs	Yes
	/MVTSs/PSPs?	
40 h		V
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	
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	
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 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:	
10 p1	Check cashing service	No
19 p1		INO
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	Yes
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	
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	Our walk-in customers are limited to our purchase-sale of foreign money currency in our exchange office situated in our main premises. All of them are contrasted against sanctions lists and if the amount is equal or above 6.000 euros (six thousand euros) they need to provide support documents to verify the origin of funds.
19 q	Other high-risk products and services identified by the Entity (please specify)	No
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	No
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Lisbon and Luxembourg branches only provide securities services (despositary, custody, clearing and settlement).
21	If appropriate, provide any additional information/context to the answers in this section.	19a1g: only have one legacy client and we do not seek to increase this line of business. 19p3: Enhanced due diligence is carried out for institutional FX customers. For walk-in customers, the procedure
		described on 19p5 applies.
3 AML C	TE & SANCTIONS PROGRAMME	
	TF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	described on 19p5 applies.
	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the	
22 22 a	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise	described on 19p5 applies. Yes
22 a 22 b	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	Yes Yes
22 a 22 b 22 c	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	Yes Yes Yes
22 a 22 b 22 c 22 d	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	Yes Yes Yes Yes Yes
22 a 22 b 22 c	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	Yes Yes Yes
22 a 22 b 22 c 22 d 22 e	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	Yes Yes Yes Yes Yes Yes Yes Yes
22 a 22 b 22 c 22 d 22 e 22 f	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	Yes Yes Yes Yes Yes Yes Yes Yes Yes
22 a 22 b 22 c 22 d 22 e 22 f 22 g	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	Yes
22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	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	Yes
22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	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	Yes
22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	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	Yes
22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	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	Yes
22 a 22 b 22 c 22 c 22 d 22 e 22 f 22 g 22 h 22 j	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	Yes

	To de train of the	N.
22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML,	1-10
	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	
23	reporting on the status of the AML, CTF, & Sanctions	Yes
	programme?	.65
26	Does the Entity use third parties to carry out any	
	components of its AML, CTF & Sanctions programme?	Yes
26 a	If Y, provide further details	
20 a	ii 1, provide further details	
		Just the preanalysis of part of the alerts and periodic review of certain customers.
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	
28 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to	
	the answers in this section.	
4 ANTIDE	DIDEDY & CORDUNTION	
	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and	Yes
	requirements to reasonably prevent, detect and report	
31	bribery and corruption? Does the Entity have an enterprise wide programme that	
31	sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers	
32	with sufficient experience/expertise responsible for	Yes
	coordinating the ABC programme?	165
	Cooldinating the ADC programme:	
33		
33	Does the Entity have adequate staff with appropriate levels	
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC	Yes
	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
33 34 35	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC	
34	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to:	Yes
34 35	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that:	Yes
34 35	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC 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	Yes
34 35	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC 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	Yes Both joint ventures and third parties acting on behalf of the Entity
34 35 35 a	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC 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	Yes Both joint ventures and third parties acting on behalf of the Entity
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34 35 35 a	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC 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?	Yes Both joint ventures and third parties acting on behalf of the Entity
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34 35 35 a	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC 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 books and records (this may be within the ABC policy or any	Yes Both joint ventures and third parties acting on behalf of the Entity Yes Yes
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34 35 35 a 35 b 35 c 36 37	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC 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 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?	Yes Both joint ventures and third parties acting on behalf of the Entity Yes Yes Yes Yes
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34 35 35 a 35 b 35 c 36 37	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC 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 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.	Yes Yes Yes Yes Yes Yes Yes Yes
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34 35 35 35 a 35 b 35 c 36 37 38	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC 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 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?	Yes Yes Yes Yes Yes Yes Yes Yes
34 35 35 a 35 b 35 c 36 37 38	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC 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 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	Yes Yes Yes Yes Yes Yes Yes Yes
34 35 35 35 a 35 b 35 c 36 37 38 38 a	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC 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 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.	Yes Both joint ventures and third parties acting on behalf of the Entity Yes Yes Yes Yes Yes Yes Yes Ye
34 35 35 35 a 35 b 35 c 36 37 38	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC 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 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	Yes Both joint ventures and third parties acting on behalf of the Entity Yes Yes Yes Yes Yes Yes Yes Ye
34 35 35 35 a 35 b 35 c 36 37 38 38 a 39 40 40 a	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC 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 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	Yes Both joint ventures and third parties acting on behalf of the Entity Yes Yes Yes Yes Yes Yes Yes Ye
34 35 35 35 a 35 b 35 c 36 37 38 38 a	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC 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 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	Yes Both joint ventures and third parties acting on behalf of the Entity Yes Yes Yes Yes Yes Yes Yes Ye
34 35 35 35 a 35 b 35 c 36 37 38 38 a 39 40 40 a	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC 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 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	Yes Both joint ventures and third parties acting on behalf of the Entity Yes Yes Yes Yes Yes Yes Yes Ye
34 35 35 35 a 35 b 35 c 36 37 38 38 a 39 40 40 a 40 b	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC 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 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	Yes Both joint ventures and third parties acting on behalf of the Entity Yes Yes Yes Yes Yes Yes Yes Ye
34 35 35 35 a 35 b 35 c 36 37 38 38 a 39 40 40 a	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC 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 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	Yes Both joint ventures and third parties acting on behalf of the Entity Yes Yes Yes Yes Yes Yes Yes Ye
34 35 35 35 a 35 b 35 c 36 37 38 38 a 39 40 40 a 40 b	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC 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 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	Yes Both joint ventures and third parties acting on behalf of the Entity Yes Yes Yes Yes Yes Yes Yes Ye
34 35 35 35 a 35 b 35 c 36 37 38 38 a 39 40 40 a 40 b	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC 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 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	Yes Both joint ventures and third parties acting on behalf of the Entity Yes Yes Yes Yes Yes Yes Yes Ye
34 35 35 a 35 b 35 c 36 37 38 38 a 39 40 40 a 40 b	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC 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 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 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 Both joint ventures and third parties acting on behalf of the Entity Yes Yes Yes Yes Yes Yes Yes Ye
34 35 35 a 35 b 35 c 36 37 38 38 a 39 40 40 a 40 b	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC 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 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	Yes Both joint ventures and third parties acting on behalf of the Entity Yes Yes Yes Yes Yes Yes Yes Ye

40 e		
-10 0	Changes in business activities that may materially	Yes
41	increase the Entity's corruption risk Does the Entity's internal audit function or other	
41	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	V
	specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	100
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	
45	the answers in this section.	
	the driswers in this section.	
5. AML, C	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?	
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	Yes
40.1	fictitious named accounts Prohibit the opening and keeping of accounts for	
	r rombii ine obening and keeding of accounts for	Yes
49 b		166
	unlicensed banks and/or NBFIs	
49 b	unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking	Yes
49 c	unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
	unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks	Yes Yes
49 c 49 d	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	Yes
49 c 49 d	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	Yes Yes Yes
49 c 49 d 49 e	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	Yes Yes
49 c 49 d 49 e	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	Yes Yes Yes
49 c 49 d 49 e	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	Yes Yes Yes Yes
49 c 49 d 49 e	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	Yes Yes Yes
49 c 49 d 49 e	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	Yes Yes Yes Yes
49 c 49 d 49 e	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 houses, casa de cambio, bureaux de change or money	Yes Yes Yes Yes
49 c 49 d 49 e 49 f 49 g	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 houses, casa de cambio, bureaux de change or money transfer agents	Yes Yes Yes Yes Yes Yes
49 c 49 d 49 e 49 f 49 g	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 houses, casa de cambio, bureaux de change or money transfer agents Assess the risks of relationships with domestic and	Yes Yes Yes Yes Yes Yes

49 i	Define the process for escalating financial crime risk	Yes
	issues/potentially suspicious activity identified by employees	Tes
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.	
53	If appropriate, provide any additional information/context to	
	the answers in this section.	
6 АМІ СТ	F & SANCTIONS RISK ASSESSMENT	
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 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls	Yes Yes
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes Yes
54 a 54 b 54 c 54 d 55 a 55 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Yes Yes
54 a 54 b 54 c 55 d d 55 a 55 b 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 Dilligence PEP Identification	Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 a 55 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	Yes
54 a 54 a 54 b 54 c 54 d 55 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	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 Training and Education	Yes
54 a 54 b 54 c 54 d 55 a 55 c 55 d 55 c 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 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 Governance Management Information Has the Entity's AML & CTF EWRA been completed in the	Yes
54 a 54 a 54 b 54 c 54 c 54 d 55 55 a 55 a 55 c 55 d 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 Governance Management Information	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	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. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
54 a 54 a 54 b 54 c 54 d 55 a 55 b 55 c 55 d 55 b 55 c 55 d 55 c 55 d 55 a 55 f 55 d 55 f 55 d 55 f 55 d 55 h 56 a 57 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	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 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 a 55 b 55 c 55 d 55 b 55 c 55 d 55 c 55 d 55 a 55 f 55 d 55 f 55 d 55 f 55 d 55 h 56 a 57 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	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 f 55 a 55 f 55 c 55 f 55 7 57 a 57 b 57 c 57 d 58	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 f 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	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 a 58 a 58 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 f 56 a 57 a 57 a 57 c 57 d 58	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

58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the	Ven
<u> </u>	last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context to the answers in this section.	
7 KYC CI	DD 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 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:	W.
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c 65 d	Key controllers Other relevant parties	Yes Yes
66 66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	25%
67	Does the due diligence process result in customers receiving a risk classification?	Yes
67 a	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.
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes
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"	As a wholesale bank, we offer services mainly to other financial entities, and on site vists are part of the first line regular activity.
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 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

	T	
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	Yes.
	they are PEPs, or controlled by PEPs?	Yes
	7	
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?	103
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 a4	Trigger-based or perpetual monitoring reviews	Yes
74 a5 74 a6	Other (Please specify)	100
74 ab	Other (Please specify)	
75	Does the Entity maintain and report metrics on current and	
, ,	past periodic or trigger event due diligence reviews?	Yes
	past periodic of trigger event due diligence reviews:	
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	Always subject to EDD
76 b	Respondent Banks If EDD or restricted, does the EDD assessment contain	Always subject to EDD
76 b 76 b1	If EDD or restricted, does the EDD assessment contain	
	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg	Always subject to EDD Yes
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates	Yes Do not have this category of customer or industry
76 b1 76 c 76 d	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	Yes Do not have this category of customer or industry EDD on risk-based approach
76 b1 76 c 76 d 76 e	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	Yes Do not have this category of customer or industry EDD on risk-based approach Prohibited
76 b1 76 c 76 d 76 e 76 f	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	Yes Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach
76 b1 76 c 76 d 76 e 76 f 76 g	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	Yes Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited
76 b1 76 c 76 d 76 e 76 f 76 g 76 h	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	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 b1 76 c 76 d 76 e 76 f 76 g 76 h 76 i	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	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
76 b1 76 c 76 d 76 e 76 f 76 g 76 h 76 i 76 j	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	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 b1 76 c 76 d 76 e 76 f 76 g 76 h 76 i	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	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
76 b1 76 c 76 d 76 e 76 f 76 g 76 h 76 i 76 j	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	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 c 76 d 76 e 76 f 76 g 76 i 76 j 76 k	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	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 c 76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 m	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	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
76 c 76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 i 76 m 76 n	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	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 b1 76 c 76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 n 76 n	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	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 b1 76 c 76 d 76 e 76 f 76 g 76 i 76 j 76 k 76 l 76 n 76 o 76 p	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	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 b1 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	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	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 b1 76 c 76 d 76 e 76 f 76 f 76 i 76 i 76 i 76 i 76 n 76 n 76 o 76 o 76 q 76 q	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	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
76 b1 76 c 76 d 76 e 76 f 76 s 76 h 76 i 76 i 76 i 76 k 76 n 76 n 76 o 76 p 76 r 76 r	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	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 b1 76 c 76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 n 76 n 76 o 76 p 76 c	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	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
76 b1 76 c 76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 n 76 n 76 n 76 o 76 p 76 q 76 r 76 s	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 Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies	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
76 b1 76 c 76 d 76 e 76 f 76 f 76 i 76 i 76 i 76 n 76 n 76 n 76 o 76 q 76 r 76 s 76 t 76 s	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	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 BD 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
76 b1 76 c 76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 n 76 n 76 n 76 o 76 p 76 q 76 r 76 s	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 Used Car Dealers	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 b1 76 c 76 d 76 e 76 f 76 f 76 j 76 k 76 i 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 v 76 w	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	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 BD 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
76 b1 76 c 76 d 76 e 76 f 76 s 76 h 76 i 76 i 76 i 76 n 76 n 76 n 76 o 76 p 76 c 76 c	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 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	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 b1 76 c 76 d 76 e 76 f 76 f 76 j 76 k 76 i 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 v 76 w	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 Used Car Dealers	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 b1 76 c 76 d 76 e 76 f 76 s 76 h 76 i 76 i 76 i 76 n 76 n 76 n 76 o 76 p 76 c 76 c	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 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	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 b1 76 c 76 d 76 e 76 f 76 s 76 h 76 i 76 i 76 i 76 n 76 n 76 n 76 o 76 p 76 c 76 c	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 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	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 b1 76 c 76 d 76 e 76 f 76 s 76 h 76 i 76 i 76 i 76 n 76 n 76 n 76 o 76 p 76 c 76 c	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 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	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 b1 76 c 76 d 76 e 76 f 76 s 76 h 76 i 76 i 76 i 76 n 76 n 76 n 76 o 76 p 76 c 76 c	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 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	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 b1 76 c 76 d 76 e 76 f 76 g 76 h 76 i 76 i 76 n 76 n 76 n 76 c 76 q 76 q 76 q 76 y 76 y	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 Used Car Dealers Virtual Asset Service Providers Other (specify)	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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		the answers in this section.	
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Transparency Standards?			
mansparency otanuarus?	9. PAYME 92	Does the Entity adhere to the Wolfsberg Group Payment	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 are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANCT	IONS	
98	Does the Entity have a Sanctions Policy approved by	
30	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 sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
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)	Used for screening customers and beneficial owners and for filtering transactional data

106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Other (specify)	oscorior screening customers and beneficial owners and for intering transactional data
1001	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.	
110	If appropriate, provide any additional information/context to the answers in this section.	
11. TRAIN	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
		Other
114 a	If Y, how frequently is training delivered?	Other

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prointically, on a risk-based approach (1-3 years) and/or, for the personnel in our branches, as required by local regulation. 17	116		114a: Training is delivered all staff (i) at onboarding (ii) in case AMI CTF legal or regulatory changes/undates: (iii)
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risk? 128 Does the Entity have a dedicated team responsible for Ves			
I YES			Yes
preventing & detecting fraud? 100	128		Yes
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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.	
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) 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)		