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Financial Institution Name:	
Location (Country) :	

The questionnaire is required to be answered on a Legal Entity (LE) Level. This means the Financial Institution will answer the questionnaire at an ultimate parent / head office & subsidiary level for which any branches would be considered covered by that parent/subsidiary DDQ. This questionnaire should not cover more than one LE. Each question in the DDQ 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 differed for one of its branches this needs to be highlighted and detail regarding this difference captured at the end of each subsection. If a branch business activity (products offered, client base etc.) is significantly different than its head office, the branch should complete a separate questionnaire.

lo#	Question	Answer
	TITY & OWNERSHIP	
	Full Legal Name	
-		
2	Append a list of branches which are covered by	<u> </u>
-	this questionnaire	
	Full Legal (Registered) Address	<u>, </u>
3	Full Legal (Registered) Address	
		r.
4	Full Primary Business Address (if different from	
	above)	
		<u>, </u>
5	Date of Entity incorporation/ establishment	
6	Select type of ownership and append an	
	pwnership chart if available	· .
6 a	Publicly Traded (25% of shares publicly traded)	
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	
6 b	Member Owned/ Mutual	h.
6 c	Government or State Owned by 25% or more	
6 d	Privately Owned	
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer	<u>^.</u>
-	shares	
8	Does the Entity, or any of its branches, operate	<u>`</u>
•	under an Offshore Banking License (OBL) ?	
8 a	If Y, provide the name of the relevant branch/es	
	which operate under an OBL	
9	Name of primary financial regulator / supervisory	r.
-	authority	
	1	
10	Provide Legal Entity Identifier (LEI) if available	k.
10	Frovide Legal Entity Identifier (LEI) II available	
	\ ,	<u></u>

11	Provide the full legal name of the ultimate parent	
	(if different from the Entity completing the DDQ)	
12	Jurisdiction of licensing authority and regulator	
	of ultimate parent	
	or diamate parent	
13	Select the business areas applicable to the	
	Entity	
13 a	Retail Banking	
13 b	Private Banking / Wealth Management	
13 c	Commercial Banking	
13 d	Transactional Banking	
13 e	Investment Banking	
13 f	Financial Markets Trading	
13 g	Securities Services/ Custody	
13 h	Broker/Dealer	
13 i	Multilateral Development Bank	
13 j	Other	
,		
	D 11 F 13 1 1 15 1/400/	
14	Does the Entity have a significant (10% or	
14	Does the Entity have a significant (10% or more) offshore customer base, either by	
14	more) offshore customer base, either by	
14	more) offshore customer base, either by number of customers or by revenues (where off-	
14	more) offshore customer base, either by number of customers or by revenues (where off- shore means not domiciled in the jurisdiction	
	more) offshore customer base, either by number of customers or by revenues (where off- shore means not domiciled in the jurisdiction where bank services are being provided)?	
14 14 a	more) offshore customer base, either by number of customers or by revenues (where off- shore means not domiciled in the jurisdiction	
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14 a	more) offshore customer base, either by number of customers or by revenues (where offshore means not domiciled in the jurisdiction where bank services are being provided)? If Y, provide details of the country and %	
14 a	more) offshore customer base, either by number of customers or by revenues (where offshore means not domiciled in the jurisdiction where bank services are being provided)? If Y, provide details of the country and % Select the closest value:	
14 a 15 15 a	more) offshore customer base, either by number of customers or by revenues (where offshore means not domiciled in the jurisdiction where bank services are being provided)? If Y, provide details of the country and % Select the closest value: Number of employees	
14 a 15 15 a 15 b	more) offshore customer base, either by number of customers or by revenues (where offshore means not domiciled in the jurisdiction where bank services are being provided)? If Y, provide details of the country and % Select the closest value: Number of employees Total Assets	
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2 004	ODUCTO & CEDVICES	
	ODUCTS & SERVICES	
17	Does the Entity offer the following products and	
	services:	
17 a	Correspondent Banking	
	If Y	
17 a2	Does the Entity offer Correspondent Banking	
	services to domestic banks?	
17 a3	Does the Entity allow domestic bank clients to	
	provide downstream relationships?	
17 a4	Does the Entity have processes and procedures	
	in place to identify downstream relationships	
17 a5	with domestic banks? Does the Entity offer correspondent banking	
17 as	services to Foreign Banks?	
17 a6	Does the Entity allow downstream relationships	
17 ao	with Foreign Banks?	
17 a7	Does the Entity have processes and procedures	
ıı aı	in place to identify downstream relationships	
	with Foreign Banks?	
17 a8	Does the Entity offer correspondent banking	
17 a8	services to regulated MSBs/MVTS?	
17 a9	Does the Entity allow downstream relationships	
17 89	with MSBs/MVTS?	
17 210	Does the Entity have processes and procedures	
17 410	in place to identify downstream relationships	
	with MSB /MVTS?	
17 b	Private Banking (domestic & international)	
17 C	Trade Finance	
17 d	Payable Through Accounts	
17 e	Stored Value Instruments	
17 f	Cross Border Bulk Cash Delivery	
17 q	Domestic Bulk Cash Delivery	
17 g 17 h	International Cash Letter	
17 ii	Remote Deposit Capture	
	Virtual /Digital Currencies	
17 j	Low Price Securities	
17 k	Hold Mail	
17 I		
17 m	Cross Border Remittances	
17 n	Service to walk-in customers (non-account	
17.5	holders) Sponsoring Private ATMs	
17 o	Other high risk products and services identified	
17 p	by the Entity	
	by the Littly	
18	Confirm that all responses provided in the	
	above Section PRODUCTS & SERVICES are	
	representative of all the LE's branches	
18 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to.	
18 b	If appropriate, provide any additional	
10 0	information / context to the answers in this	
	section.	
	Section.	

3. AM	L, CTF & SANCTIONS PROGRAMME	
<u>3. Aivi</u> 19	Does the Entity have a programme that sets	
13	minimum AML, CTF and Sanctions standards	
	regarding the following components:	
19 a	Appointed Officer with sufficient	
19 a	experience/expertise	
19 b	Cash Reporting	
19 c	CDD	
19 d	EDD	
	Beneficial Ownership	
19 e		
19 f	Independent Testing	
19 g	Periodic Review	
19 h	Policies and Procedures	
19 i	Risk Assessment	
19 ј	Sanctions	
19 k	PEP Screening	
19 I	Adverse Information Screening	
19 m	Suspicious Activity Reporting	
19 n	Training and Education	
19 o	Transaction Monitoring	
20	How many full time employees are in the	
	Entity's AML, CTF & Sanctions Compliance	
	Department?	
21	Is the Entity's AML, CTF & Sanctions policy	
	approved at least annually by the Board or	
	equivalent Senior Management Committee?	
22	Does the Board or equivalent Senior	
	Management Committee receive regular	
	reporting on the status of the AML, CTF &	
	Sanctions programme?	
23	Does the Entity use third parties to carry out any	
	components of its AML, CTF & Sanctions	
	programme?	
23 a	If Y, provide further details	
24	Confirm that all responses provided in the above	
	Section AML, CTF & SANCTIONS Programme	
	are Representative of all the LE's branches	
24 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to.	
24 b	If appropriate, provide any additional	
-40	information / context to the answers in this	
	section.	
	SCOUOTI.	

4 ANI	TI BRIBERY & CORRUPTION	
4. AN	Has the Entity documented policies and	
25	procedures consistent with applicable ABC	
	regulations and requirements to [reasonably]	
	prevent, detect and report bribery and	
	corruption?	
26	Does the Entity have an enterprise wide	
	programme that sets minimum ABC standards?	
27	Has the Entity appointed a designated officer or	
	officers with sufficient experience/expertise	
	responsible for coordinating the ABC	
	programme?	
28	Does the Entity have adequate staff with	
	appropriate levels of experience/expertise to	
	implement the ABC programme?	
29	Is the Entity's ABC programme applicable to:	
29 a	Joint ventures	
29 b	Third parties acting on behalf of the Entity	
30	Does the Entity have a global ABC policy that:	
30 a	Prohibits the giving and receiving of bribes?	
	This includes promising, offering, giving,	
	solicitation or receiving of anything of value,	
	directly or indirectly, if improperly intended to	
	influence action or obtain an advantage	
30 b	Includes enhanced requirements regarding	
	interaction with public officials?	
30 с	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)?	
31	Does the Entity have controls in place to	
	monitor the effectiveness of their ABC	
20	programme?	
32	Does the Entity's Board or Senior Management	
	Committee receive regular Management Information on ABC matters?	
33	Does the Entity perform an Enterprise Wide	
33	ABC risk assessment?	
33 a	If Y select the frequency	
34	Does the Entity have an ABC residual risk rating	
	that is the net result of the controls	
	effectiveness and the inherent risk	
	assessment?	

55 Does the Entity's RAC EWRA cover the inherent this components detailed below: 56 a Potential liability created by intermediaries and other third-party providers as appropriate 57 Doruption risks associated with the countries and notatines in which the Entity does business, and industries or public officials 58 Corruption risks associated with gifts and topic the provided in the above Section Anti Bribery & Corruption are representative of all the LE branches 59 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.			
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5 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries. 5 c I Transactions, products or services, including thosethat involve state-owned or state-controlled entities or public officials 5 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions 5 e Changes in business activities that may materially increase the Entity's corruption risk materially increase the Entity's corruption or other independent third party cover ABC Policies and Procedures? 5 Does the Entity provide mandatory ABC training to be entity provide Management 5 d Ist Line of Defence 5 d Line of Defence 5 d Line of Defence 5 d Industrial training that is subject to ABC risk have been outsourced subject to ABC risk have been outsourced 5 d Corruption and the provide ABC training that is largeted to specific roles, responsibilities and activities? 5 d Corruption are representative of all the LE's branches 6 d Corruption are representative of all the LE's branches 7 d All roles of the entity provide ABC training that is largeted to specific roles, responsibilities and activities?			
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39 b If appropriate, provide any additional information	39 a		
		relate to and the branch/es that this applies to.	
	39 h	If appropriate, provide any additional information	
	73.5		
		CONTEXT TO THE ALLOWERS III THIS SECTION.	
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5 PO	LICIES & PROCEDURES	
40	Has the Entity documented policies and	
"	procedures consistent with applicable AML,	
	CTF & Sanctions regulations and requirements	
	to reasonably prevent, detect and report:	
40 a	Money laundering	
40 b	Terrorist financing	
40 c	Sanctions violations	
41	Are the Entity's policies and procedures	
42	updated at least annually? Are the Entity's policies and procedures gapped	
42	against/compared to:	
42 a	US Standards	
	If Y, does the Entity retain a record of the	
	results?	
42 b	EU Standards	
42 b1	If Y, does the Entity retain a record of the	
40	results?	
43	Does the Entity have policies and procedures that:	
	ulat.	
43 a	Prohibit the opening and keeping of anonymous	
	and fictitious named accounts	
43 b	Prohibit the opening and keeping of accounts	
	for unlicensed banks and/or NBFIs	
40	Doob ib is also like as wish sale (10) (1)	
43 c	Prohibit dealing with other entities that provide	
	banking services to unlicensed banks	
43 d	Prohibit accounts/relationships with shell banks	
43 e	Prohibit dealing with another entity that provides	
	services to shell banks	
43 f	Prohibit opening and keeping of accounts for	
101	Section 311 designated entities	
42 a	, and the second	
43 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance	
	agents, exchanges houses, casa de cambio,	
	bureaux de change or money transfer agents	
43 h	Assess the risks of relationships with PEPs,	
	including their family and close associates	
43 i	Define escalation processes for financial crime	
101	risk issues	
40 :		
43 j	Define the process, where appropriate, for	
	terminating existing customer relationships due to financial crime risk	
43 k	Specify how potentially suspicious activity	
	identified by employees is to be escalated and	
	investigated	
43 I	Outline the processes regarding screening for	
1	sanctions, PEPs and negative media	
43 m	Outline the processes for the maintenance of	
	internal "watchlists"	
44	Has the Entity defined a risk tolerance	
**	statement or similar document which defines a	
	risk boundary around their business?	
45	,	
45	Does the Entity have a record retention	
	procedures that comply with applicable laws?	
45 a	If Y, what is the retention period?	
46	Confirm that all responses provided in the	
40	above Section POLICIES & PROCEDURES are	
1	representative of all the LE's branches	
46 -	'	
46 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to.	
45:		
46 b	If appropriate, provide any additional	
	information / context to the answers in this	
1	section.	
		

6. AM	L, CTF & SANCTIONS RISK ASSESSMEN	Т
47	Does the Entity's AML & CTF EWRA cover the	,
	inherent risk components detailed below:	
47 a	Client	
47 b	Product	
47 c	Channel	
47 d	Geography	
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	
48 b	Customer Due Diligence	
48 c	PEP Identification	
48 d	Transaction Screening	
48 e	Name Screening against Adverse Media & Negative News	
48 f	Training and Education	
48 g	Governance	
48 h	Management Information	
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	
50 b	Product	
50 c	Channel	
50 d	Geography	
51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
51 a	Customer Due Diligence	
51 b	Transaction Screening	
51 c	Name Screening	
51 d	List Management	
51 e	Training and Education	
51 f	Governance	
51 g	Management Information	
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	
52 a	If N, provide the date when the last Sanctions EWRA was completed.	
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	
53 a	If N, clarify which questions the difference/srelate to and the branch/es that this applies to.	
53 b	If appropriate, provide any additional information / context to the answers in this section.	

7. KY	C, CDD and EDD	
54	Does the Entity verify the identity of the	
	customer?	
55	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	
	,	
56	Which of the following does the Entity gather and retain when conducting CDD? Select	
	all that apply:	
56 a	Ownership structure	
56 b	Customer identification	
56 c	Expected activity	
56 d	Nature of business/employment	
56 e	Product usage	
56 f	Purpose and nature of relationship	
	Source of funds	
56 g		
56 h	Source of wealth	
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	
57 a1	Are ultimate beneficial owners verified?	
57 b	Authorised signatories (where applicable)	
57 c	Key controllers	
57 d	Other relevant parties	
58	What is the Entity's minimum (lowest) threshold	
	applied to beneficial ownership identification?	
59	Does the due diligence process result in	
	customers receiving a risk classification?	
00		
60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that	
	apply:	
60 a	Product Usage	
60 b	Geography	
60 c	Business Type/Industry	
60 d	Legal Entity type	
60 e	Adverse Information	
60 f	Other (specify)	
301	Canor (Specify)	

61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	
62	If Y, is this at:	
62 a	Onboarding	
62 b	KYC renewal	
62 c	Trigger event	
63	What is the method used by the Entity to screen for adverse media / negative news?	
63 a	Automated	
63 b	Manual	
63 c	Combination of automated and manual	
64	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
65	If Y, is this at:	
65 a	Onboarding	
65 b	KYC renewal	
65 c	Trigger event	
66	What is the method used by the Entity to screen PEPs?	
66 a	Automated	
66 b	Manual	
66 c	Combination of automated and manual	
67	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	
68 b	Trigger event	
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	

70	From the list below, which categories of customers or industries are subject to EDD and/ or are restricted, or prohibited by the Entity's FCC programme?	
70 a	Non-account customers	
70 b	Offshore customers	
70 c	Shell banks	
70 d	MVTS/ MSB customers	
70 e	PEPs	
70 f	PEP Related	
70 g	PEP Close Associate	
70 h	Correspondent Banks	
70 h1	If EDD or EDD & Restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	
70 i	Arms, defense, military	
70 j	Atomic power	
70 k	Extractive industries	
70 I	Precious metals and stones	
70 m	Unregulated charities	
70 n	Regulated charities	
70 o	Red light business / Adult entertainment	
70 p	Non-Government Organisations	
70 q	Virtual currencies	
70 r	Marijuana	
70 s	Embassies/Consulates	
70 t	Gambling	
70 u	Payment Service Provider	
70 v	Other (specify)	
71	If restricted, provide details of the restriction	
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	
73 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
73 b	If appropriate, provide any additional information / context to the answers in this section.	

8. MO	NITORING & REPORTING	
74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	
75	What is the method used by the Entity to monitor transactions for suspicious activities?	
75 a	Automated	
75 b	Manual	
75 c	Combination of automated and manual	
76	If manual or combination selected, specify what type of transactions are monitored manually	
77	Does the Entity have regulatory requirements to report currency transactions?	
77 a	If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements?	
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
79 b	If appropriate, provide any additional information / context to the answers in this section.	
9. PA	MENT TRANSPARENCY	
80	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	
81	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
81 a	FATF Recommendation 16	
81 b	Local Regulations	
81 b1	Specify the regulation	
81 c	If N, explain	
82	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	
83	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	

84	Does the Entity have controls to support the inclusion of required beneficiary in international payment messages?	
85	Confirm that all responses provided in the aboveSection PAYMENT TRANSPARENCY are representative of all the LE's branches	
85 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
85 b	If appropriate, provide any additional information / context to the answers in this section.	
10 S	ANCTIONS	
86	Does the Entity have a Sanctions Policy	
00	approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions?	
87	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)?	
88	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?	
89	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	
90	What is the method used by the Entity?	
90 a	Manual	
90 b	Automated	
	Combination of Automated and Manual	
91	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	
92	What is the method used by the Entity?	
92 a	Manual	
92 b	Automated	
92 c	Combination Automated and Manual	
93	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
93 a	Consolidated United Nations Security Council Sanctions List (UN)	
93 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	
93 c	Office of Financial Sanctions Implementation HMT (OFSI)	
93 d	European Union Consolidated List (EU)	
93 e	Lists maintained by other G7 member countries	

93 f	Other (specify)	
931	Other (specify)	
94	When new entities and natural persons are	
	added to sanctions lists, how many business days before the Entity updates its lists?	
95	When updates or additions to the Sanctions Lists are made, how many business days	
	before the Entity updates their active manual	
	and / or automated screening system against:	
95 a	Customer Data	
35 a	Customer Data	
95 b	Transactions	
96	Does the Entity have a physical presence, e.g.,	
	branches, subsidiaries, or representative offices located in countries/regions against which UN,	
	OFAC, OFSI, EU and G7 member countries	
	have enacted comprehensive jurisdiction-based	
97	Sanctions? Confirm that all responses provided in the	
ļ.	above Section SANCTIONS are representative	
07 -	of all the LE's branches	
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional	
	information / context to the answers in this section.	
	0001071.	
11. TI	RAINING & EDUCATION	
98	Does the Entity provide mandatory training,	
	which includes :	
98 a	Identification and reporting of transactions to	
	government authorities	
98 b	Examples of different forms of money	
	laundering, terrorist financing and sanctions violations relevant for the types of products and	
	services offered	
98 c	Internal policies for controlling money	
	laundering, terrorist financing and sanctions	
	violations	
98 d	New issues that occur in the market, e.g.,	
	significant regulatory actions or new regulations	
98 e	Conduct and Culture	
99	Is the above mandatory training provided to :	
99 a	Board and Senior Committee Management	
99 b	1st Line of Defence	
99 с	2nd Line of Defence	
99 d	3rd Line of Defence	
99 е	3rd parties to which specific FCC activities have	
	been outsourced	
99 f	Non-employed workers (contractors/consultants)	
	, ,	
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles,	
	responsibilities and high risk products, services	
	and activities?	

Does the Entity provide customised training for AML, CTF and Sanctions staff?	
Confirm that all responses provided in the aboveSection TRAINING & EDUCATION are representative of all the LE's branches	
If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
If appropriate, provide any additional information / context to the answers in this section.	
JALITY ASSURANCE /COMPLIANCE TES	STING
Are the Entity's KYC processes and documents subject to quality assurance testing?	
Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	
Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	
If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
If appropriate, provide any additional information / context to the answers in this section.	
JDIT	
In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF and Sanctions policies and practices on a regular basis?	
How often is the Entity audited on its AML, CTF & Sanctions programme by the following:	
Internal Audit Department	
External Third Party	
	AML, CTF and Sanctions staff? Confirm that all responses provided in the aboveSection TRAINING & EDUCATION are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information / context to the answers in this section. JALITY ASSURANCE /COMPLIANCE TESA Te the Entity's KYC processes and documents subject to quality assurance testing? Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)? Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information / context to the answers in this section. IDIT In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF & Sanctions programme by the following: Internal Audit Department

	T a	
108	Does the internal audit function or other	
	independent third party cover the following areas:	
108 a	AML, CTF & Sanctions policy and procedures	
108 b	KYC / CDD / EDD and underlying	
	methodologies	
108 c	Transaction Monitoring	
108 d	Transaction Screening including for sanctions	
108 e	Name Screening & List Management	
108 f	Training & Education	
108 g	Technology	
	Governance	
108 i	Reporting/Metrics & Management Information	
108 j	Suspicious Activity Filing	
400.1	Entermaine Wide Biole Accessor	
108 k	Enterprise Wide Risk Assessment	
108 I	Other (specify)	
	(-p)	
109	Are adverse findings from internal & external	
	audit tracked to completion and assessed for	
	adequacy and completeness?	
110	Confirm that all responses provided in the	
	above Section, AUDIT are representative of all	
	the LE's branches	
110 a	If N, clarify which questions the difference/s	
""	relate to and the branch/es that this applies to.	
110 b	If appropriate, provide any additional	
	information / context to the answers in this	
	section.	
	<u> </u>	

Declaration Statement

Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)
(Bank 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.
(Bank name) 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.
(Bank name) recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.
(Bank name) 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 on an annual basis. (Bank name) commits to file accurate supplemental information on a timely basis.
I, (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of (Bank name)
I, (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of (Bank name)
(Signature & Date (DD/MM/YYYY))
(Signature & Date (DD/MM/YYYY))