



Financial Institution Name:  
Location (Country) :

Bank Vontobel AG
Switzerland

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 #	Question	Answer
<b>1. ENTITY &amp; OWNERSHIP</b>		
1	Full Legal Name	Bank Vontobel aG
2	Append a list of foreign branches which are covered by this questionnaire	No Branches abroad
3	Full Legal (Registered) Address	Gotthardstrasse 43, CH-8022 Zürich
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	03.01.1984
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	
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	Vontobel Holding AG (100%), publicly listed on the SIX Swiss Exchange (VONN SWX)
7	% of the Entity's total shares composed of bearer shares	No Bearer Shares
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Name of primary financial regulator/supervisory authority	Swiss Financial Supervisory Authority (FINMA)
11	Provide Legal Entity Identifier (LEI) if available	549300L7V4MGE CYRM576
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	Vontobel Holding

<b>13</b>	Jurisdiction of licensing authority and regulator of ultimate parent	Switzerland
<b>14</b>	Select the business areas applicable to the Entity	
<b>14 a</b>	Retail Banking	No
<b>14 b</b>	Private Banking	Yes
<b>14 c</b>	Commercial Banking	No
<b>14 d</b>	Transactional Banking	Yes
<b>14 e</b>	Investment Banking	No
<b>14 f</b>	Financial Markets Trading	Yes
<b>14 g</b>	Securities Services/Custody	Yes
<b>14 h</b>	Broker/Dealer	Yes
<b>14 i</b>	Multilateral Development Bank	No
<b>14 j</b>	Wealth Management	Yes
<b>14 k</b>	Other (please explain)	
<b>15</b>	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)	Yes
<b>15 a</b>	If Y, provide the top five countries where the non-resident customers are located.	Germany, UK, Italy, North America
<b>16</b>	Select the closest value:	
<b>16 a</b>	Number of employees	1001-5000
<b>16 b</b>	Total Assets	Greater than \$500 million
<b>17</b>	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
<b>17 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
<b>18</b>	If appropriate, provide any additional information/context to the answers in this section.	
<b>2. PRODUCTS &amp; SERVICES</b>		
<b>19</b>	Does the Entity offer the following products and services:	
<b>19 a</b>	Correspondent Banking	Yes
<b>19 a1</b>	If Y	
<b>19 a1a</b>	Does the Entity offer Correspondent Banking services to domestic banks?	Yes
<b>19 a1b</b>	Does the Entity allow domestic bank clients to provide downstream relationships?	Yes
<b>19 a1c</b>	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes
<b>19 a1d</b>	Does the Entity offer Correspondent Banking services to foreign banks?	Yes
<b>19 a1e</b>	Does the Entity allow downstream relationships with foreign banks?	Yes
<b>19 a1f</b>	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Yes
<b>19 a1g</b>	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTs)?	No
<b>19 a1h</b>	Does the Entity allow downstream relationships with MSBs, MVTs, or Payment Service Provider (PSPs)?	
<b>19 a1h1</b>	MSBs	No
<b>19 a1h2</b>	MVTs	No
<b>19 a1h3</b>	PSPs	No

<b>19 a11</b>	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSS/PSPs?	Yes
<b>19 b</b>	Cross-Border Bulk Cash Delivery	No
<b>19 c</b>	Cross-Border Remittances	Yes
<b>19 d</b>	Domestic Bulk Cash Delivery	No
<b>19 e</b>	Hold Mail	No
<b>19 f</b>	International Cash Letter	Yes
<b>19 g</b>	Low Price Securities	Yes
<b>19 h</b>	Payable Through Accounts	No
<b>19 i</b>	Payment services to non-bank entities who may then offer third party payment services to their customers?	No
<b>19 i1</b>	If Y , please select all that apply below?	
<b>19 i2</b>	Third Party Payment Service Providers	No
<b>19 i3</b>	Virtual Asset Service Providers (VASPs)	No
<b>19 i4</b>	eCommerce Platforms	No
<b>19 i5</b>	Other - Please explain	
<b>19 j</b>	Private Banking	Both
<b>19 k</b>	Remote Deposit Capture (RDC)	No
<b>19 l</b>	Sponsoring Private ATMs	No
<b>19 m</b>	Stored Value Instruments	Yes
<b>19 n</b>	Trade Finance	No
<b>19 o</b>	Virtual Assets	Yes
<b>19 p</b>	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:	
<b>19 p1</b>	Check cashing service	No
<b>19 p1a</b>	If yes, state the applicable level of due diligence	Please select
<b>19 p2</b>	Wire transfers	No
<b>19 p2a</b>	If yes, state the applicable level of due diligence	Please select
<b>19 p3</b>	Foreign currency conversion	No
<b>19 p3a</b>	If yes, state the applicable level of due diligence	Please select
<b>19 p4</b>	Sale of Monetary Instruments	No
<b>19 p4a</b>	If yes, state the applicable level of due diligence	Please select
<b>19 p5</b>	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	No
<b>19 q</b>	Other high-risk products and services identified by the Entity (please specify)	No
<b>20</b>	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
<b>20 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
<b>21</b>	If appropriate, provide any additional information/context to the answers in this section.	
<b>3. AML, CTF &amp; SANCTIONS PROGRAMME</b>		
<b>22</b>	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
<b>22 a</b>	Appointed Officer with sufficient	Yes
<b>22 b</b>	Adverse Information Screening	Yes
<b>22 c</b>	Beneficial Ownership	Yes
<b>22 d</b>	Cash Reporting	Not applicable
<b>22 e</b>	CDD	Yes
<b>22 f</b>	EDD	Yes
<b>22 g</b>	Independent Testing	Yes
<b>22 h</b>	Periodic Review	Yes
<b>22 i</b>	Policies and Procedures	Yes
<b>22 j</b>	PEP Screening	Yes
<b>22 k</b>	Risk Assessment	Yes
<b>22 l</b>	Sanctions	Yes

22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	11-100
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Yes
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
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.	In Switzerland, it is not a regulatory requirement to update internal policies on a specific periodical frequency. Policy Documents are reviewed every two years if the content is important (regulated activities), otherwise every three years. Last update of the AML CFT policy performed in 2024.

**4. ANTI BRIBERY & CORRUPTION**

30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 c	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)?	Yes
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes

<b>40 b</b>	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
<b>40 c</b>	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
<b>40 d</b>	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
<b>40 e</b>	Changes in business activities that may materially increase the Entity's corruption risk	Yes
<b>41</b>	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
<b>42</b>	Does the Entity provide mandatory ABC training to:	
<b>42 a</b>	Board and senior Committee Management	Yes
<b>42 b</b>	1st Line of Defence	Yes
<b>42 c</b>	2nd Line of Defence	Yes
<b>42 d</b>	3rd Line of Defence	Yes
<b>42 e</b>	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
<b>42 f</b>	Non-employed workers as appropriate (contractors/consultants)	Yes
<b>43</b>	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
<b>44</b>	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
<b>44 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
<b>45</b>	If appropriate, provide any additional information/context to the answers in this section.	> 41. Yes it's part of the Annual Compliance Risk Assessment

**5. AML, CTF & SANCTIONS POLICIES & PROCEDURES**

<b>46</b>	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
<b>46 a</b>	Money laundering	Yes
<b>46 b</b>	Terrorist financing	Yes
<b>46 c</b>	Sanctions violations	Yes
<b>47</b>	Are the Entity's policies and procedures updated at least annually?	No
<b>48</b>	Has the Entity chosen to compare its policies and procedures against:	
<b>48 a</b>	U.S. Standards	No
<b>48 a1</b>	If Y, does the Entity retain a record of the results?	Not Applicable
<b>48 b</b>	EU Standards	No
<b>48 b1</b>	If Y, does the Entity retain a record of the results?	Not Applicable
<b>49</b>	Does the Entity have policies and procedures that:	
<b>49 a</b>	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
<b>49 b</b>	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFI	Yes
<b>49 c</b>	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
<b>49 d</b>	Prohibit accounts/relationships with shell banks	Yes
<b>49 e</b>	Prohibit dealing with another entity that provides services to shell banks	Yes
<b>49 f</b>	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
<b>49 g</b>	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
<b>49 h</b>	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes

49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
49 l	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. AML, CTF & SANCTIONS RISK ASSESSMENT**

54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 a	Client	Yes
54 b	Product	Yes
54 c	Channel	Yes
54 d	Geography	Yes
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
55 a	Transaction Monitoring	Yes
55 b	Customer Due Diligence	Yes
55 c	PEP Identification	Yes
55 d	Transaction Screening	Yes
55 e	Name Screening against Adverse Media/Negative News	Yes
55 f	Training and Education	Yes
55 g	Governance	Yes
55 h	Management Information	Yes
56	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
56 a	If N, provide the date when the last AML & CTF EWRA was completed.	
57	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
57 a	Client	Yes
57 b	Product	Yes
57 c	Channel	Yes
57 d	Geography	Yes
58	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
58 a	Customer Due Diligence	Yes
58 b	Governance	Yes
58 c	List Management	Yes
58 d	Management Information	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 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.	
<b>7. KYC, CDD and EDD</b>		
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?	Yes
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:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied to 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)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	No
68 a	If Y, is this at:	
68 a1	Onboarding	No
68 a2	KYC renewal	No
68 a3	Trigger event	No
68 a4	Other	No
68 a4a	If yes, please specify "Other"	Vontobel maintains only very limited, selected relationships with high-risk non-individual customers which are only approved subject to conditions. In such a case, an onsite visit can be part of the condition.
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

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for 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 they are PEPs, or controlled by PEPs?	Yes
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	Yes
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Prohibited
76 b	Respondent Banks	EDD on risk-based approach
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 c	Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	Always subject to EDD
76 e	Gambling customers	Always subject to EDD
76 f	General Trading Companies	Always subject to EDD
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	Always subject to EDD
76 i	Non-account customers	Prohibited
76 j	Non-Government Organisations	Always subject to EDD
76 k	Non-resident customers	EDD on risk-based approach
76 l	Nuclear power	Restricted
76 m	Payment Service Providers	Always subject to EDD
76 n	PEPs	Always subject to EDD
76 o	PEP Close Associates	Always subject to EDD
76 p	PEP Related	Always subject to EDD
76 q	Precious metals and stones	Always subject to EDD
76 r	Red light businesses/Adult entertainment	Restricted
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	Always subject to EDD
76 v	Unregulated charities	Always subject to EDD
76 w	Used Car Dealers	Always subject to EDD
76 x	Virtual Asset Service Providers	Prohibited
76 y	Other (specify)	General remark: Bank Vontobel AG has a strict approach towards Operating Companies which are systematically reported to the Bank's Compliance department (e.g. always subject to EDD)
77	If restricted, provide details of the restriction	76 g: Cultivation, manufacture, distribution and sale of substances which are subject to drug prohibition laws are prohibited. Legal substances are always subject to EDD. 76 r: Pornography is prohibited. Other adult entertainment is always subject to EDD. 76 l: Dual-use technology is prohibited
78	Does EDD require senior business management and/or compliance approval?	Yes

78 a	If Y indicate who provides the approval:	Both
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Yes
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
82	If appropriate, provide any additional information/context to the answers in this section.	
<b>8. MONITORING &amp; REPORTING</b>		
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Both
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	ACTICO
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	
<b>9. PAYMENT TRANSPARENCY</b>		
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	AMLA, AMLO, AMLO-FINMA
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	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. SANCTIONS**

98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Automated
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system or vendor-sourced tools used?	Both
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	ACTICO
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 (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	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.	
<b>11. TRAINING &amp; EDUCATION</b>		
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	Not Applicable
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
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
<b>12. QUALITY ASSURANCE /COMPLIANCE TESTING</b>		
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
<b>13. AUDIT</b>		
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Component-based reviews
122 b	External Third Party	Component-based reviews
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123 l	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
<b>14. FRAUD</b>		
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes

129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	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)

Bank Vontobel AG \_\_\_\_\_ (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, Nino Ciganovic \_\_\_\_\_ (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, Eleonore Marti-Feced \_\_\_\_\_ (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.

Sept. 26th 2024,  (Signature & Date)

Sept. 26th 2024,  (Signature & Date)