## the Wolfsberg Group

Financial Institution Name: Location (Country) :

XacBank JSC Mongolia

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
	TY & OWNERSHIP	
1	Full Legal Name	
		XacBank JSC
2	Append a list of foreign branches which are covered by	
	this questionnaire	
		XacBank JSC has no foreign branches
_	Full Level (Decistored) Address	
3	Full Legal (Registered) Address	
		Sukhbaatar District, 8th khoroo, Prime Minister Amar's Street, Ulaanbaatar, Mongolia 14210
		Sumbatai District, otti Kiloroo, Prime Millistei Amai's Street, Olaaribaatai, Mongolia 14210
4	Full Primary Business Address (if different from above)	
-	r dir r fillary Edulloss r fadices (il dillerent from above)	
		N/A
5	Date of Entity incorporation/establishment	
		12/28/2001
6	Select type of ownership and append an ownership chart	
60	if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
	If Y, indicate the exchange traded on and ticker	
6 a1		
	symbol	N/A
		1WA
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	100
Jui	beneficial owners with a holding of 10% or more	
	beneficial owners with a holding of 10% of more	https://www.xacbank.mn/page/investor-relations?lang=en
		Thips://www.xacbank.mir/page/investor-relations:rang-en
7	% of the Entity's total shares composed of bearer shares	
	, , , , , , , , , , , , , , , , , , , ,	
		N/A
8	Does the Entity, or any of its branches, operate under an	No
	Offshore Banking License (OBL)?	lao
8 a	If Y, provide the name of the relevant branch/es which	
	operate under an OBI	
	2	N/A
9	Does the Bank have a Virtual Bank License or provide	no
	services only through online channels?	
10	Name of primary financial regulator/supervisory authority	
		Bank of Mongolia (Central Bank)
11	Provide Legal Entity Identifier (LEI) if available	
		I
		2549004C59GTS57KNX52
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	
		Tenger Financial Group LLC
	1	
13	Jurisdiction of licensing authority and regulator of ultimate	
	parent	Adamanta
		Mongolia
200	Coloct the business areas co-finely to the Falls	
14	Select the business areas applicable to the Entity	

t.e.a	Retail Banking	Yes
14 a	Private Banking	No No
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	No
	Financial Markets Trading	
14 f		No No
14 g	Securities Services/Custody	No .
14 h	Broker/Dealer	No .
14 i	Multilateral Development Bank	No
14 ]	Wealth Management	No
14 k	Other (please explain)	N/A
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
40	Select the closest value:	
16		4004 5000
16 a	Number of employees	1001-5000
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
18	If appropriate, provide any additional information/context to the answers in this section.	N/A
a ppop	HOTE & SERVICES	
19	UCTS & SERVICES  Does the Entity offer the following products and services:	
40.	Correspondent Banking	
19 a		
19 a1		No
19 a1a	If Y  Does the Entity offer Correspondent Banking	No
	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to	No The state of th
19 a1a	If Y  Does the Entity offer Correspondent Banking services to domestic banks?	
19 a1a 19 a1b	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking	
19 a1a 19 a1b 19 a1c	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	
19 a1a 19 a1b 19 a1c 19 a1d	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with	
19 a1a 19 a1b 19 a1c 19 a1d 19 a1e	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?	
19 a1a 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	
19 a1a 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f 19 a1g	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	
19 a1a 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f 19 a1f	If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestlc banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	

19 a1i	Does the Entity have processes and procedures in	
	place to identify downstream relationships with	
	MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	Yes
THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NAMED IN COLUMN TW	Hold Mail	
19 e		No
19 f	International Cash Letter	No
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?	Yes
19 i1	If Y , please select all that apply below?	
19 i2	Third Party Payment Service Providers	No
19 i3	Virtual Asset Service Providers (VASPs)	Yes
19 i4	eCommerce Platforms	No
19 i5	Other - Please explain	INO
19 10	Otter - Freese explain	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
	Trade Finance	
19 n		Yes
19 0	Virtual Assets	No
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	Yes
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	Yes
19 p3a	If yes, state the applicable level of due diligence	Identification and Verification
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 detait here, including describing the level of due diligence.	Q_ 19p_ Walk-in customers can make transactions up to 5 million MNT (\$1400)
19 q	Other high-risk products and services identified by the Entity (please specify)	N/A
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
20 a	If N, clarity which questions the difference/s relate to and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	G E
2 8841 0	TF & SANCTIONS PROGRAMME	
	Does the Entity have a programme that sets minimum	
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	Yes
22 b	Adverse Information Screening	Yes
		Yes
22 c	I Beneticial Ownership	1.00
22 c	Beneficial Ownership	Von
22 d	Cash Reporting	Yes
22 d 22 e	Cash Reporting CDD	Yes
22 d	Cash Reporting CDD EDD	Yes Yes
22 d 22 e	Cash Reporting CDD EDD Independent Testing	Yes
22 d 22 e 22 f	Cash Reporting CDD EDD	Yes Yes
22 d 22 e 22 f 22 g 22 h	Cash Reporting CDD EDD Independent Testing	Yes Yes Yes
22 d 22 e 22 f 22 g 22 h 22 i	Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes Yes Yes Yes Yes
22 d 22 e 22 f 22 g 22 h 22 i 22 j	Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Yes Yes Yes Yes Yes Yes Yes Yes
22 d 22 e 22 f 22 g 22 h 22 i	Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes Yes Yes Yes Yes

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22 m	Suspicious Activity Reporting	Yes
22 n 22 o	Training and Education Transaction Monitoring	Yes Yes
23	How many full time employees are in the Entity's AML,	
	CTF & Sanctions Compliance Department?	1-10
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	Yes
	Question 29	
25	Does the Board receive, assess, and challenge regular	
	reporting on the status of the AML, CTF, & Sanctions	Yes
	programme?	
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
0.0		
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	
20	If appropriate provide any additional information/ocatest	
29	If appropriate, provide any additional information/context to the answers in this section.	
		N/A
4 ANTI	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and	Yes
	requirements to reasonably prevent, detect and report	165
24	bribery and corruption?	
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	Yes
	coordinating the ABC programme?	
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC	Yes
	programme?	Tes
34	Is the Entity's ABC programme applicable to:	Not Applicable
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	Yes
	improperly intended to influence action or obtain an	163
	advantage	
35 b	Includes enhanced requirements regarding interaction	Yes
	with public officials?	
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	Yes
	reporting on the status of the ABC programme?	100
38	Has the Entity's ABC Enterprise Wide Risk Assessment	
	(EWRA) been completed in the last 12 months?	Yes
29.2	If N provide the date when the last ADC EWIDA was	
38 a	If N, provide the date when the last ABC EWRA was completed.	
		The risk assessment associated with ABC was done in 2Q of 2024.
39	Does the Entity have an ABC residual risk rating that is	
	the net result of the controls effectiveness and the	Yes
	inherent risk assessment?	
40	Does the Entity's ABC EWRA cover the inherent risk	
40 a	components detailed below:  Potential liability created by intermediaries and other	
40 d	third-party providers as appropriate	Yes
	Corruption risks associated with the countries and	
40 b		
40 b	industries in which the Entity does business, directly or	Yes
	through Intermediaries	Yes
40 b		

40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	No
42 f	Non-employed workers as appropriate (contractors/consultants)	No
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to,	
45	If appropriate, provide any additional information/context to the answers in this section.	N/A:
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	Yés
47	Are the Entity's policies and procedures updated at least annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	Yes
48 a1	If Y, does the Entity retain a record of the results?	Yes
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	Yes
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	res
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes

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their business?  10 Does the Entity have record retention procedures that comply with applicable laws?  11 A	00		Yes
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comply with applicable laws?  If Y, what is the retention period?  5 years or more  6 years or more  7 yes  6 a representative of all the LE's branches  6 a if N, clarify which questions the difference/s relate to and the branch/es that this applies to.  N/A  6 if appropriate, provide any additional information/context to the answers in this section.  6 if appropriate, provide any additional information/context to the answers in this section.  6 if appropriate, provide any additional information/context to the answers in this section.  6 if appropriate, provide any additional information/context to the answers in this section.  6 if appropriate, provide any additional information/context to the answers in this section.  6 if AML, CTF & SANCTIONS RISK ASSESSMENT  5 d Does the Entity's AML & CTF EWRA cover the inherent insk components detailed below.  7 yes  5 d Client 7 yes  5 d Ceography 7 yes  5 Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below.  5 a Transaction Monitoring 7 yes  5 b Customer Due Diligence 7 yes  5 c PEP Identification 7 yes  5 d Transaction Monitoring 7 yes  5 d Transaction Screening against Adverse Media/Negative News 7 N	51		
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	6. AML, C' 54  54 a 54 b 54 c 54 d 55 a 55 b 55 c 55 f 55 g 55 f 56	to the answers in this section.  ITF & SANCTIONS RISK ASSESMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF	Yes
risk components detailed below:	6. AML, C' 54 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	to the answers in this section.  ITF & SANCTIONS RISK ASSESSMENT  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
TOR COMPONENTS DETAILED BEIOW.	6. AML, C' 54 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	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  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
57 a Client Yes	6. AML, C' 54 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	to the answers in this section.  ITF & SANCTIONS RISK ASSESSMENT  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
57 b Product Yes	6. AML, C 54 54 a 54 b 54 c 554 d 555 c 55 d 555 c 55 d 55 7 55 g	to the answers in this section.  ITF & SANCTIONS RISK ASSESMENT  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
57 c Channel Yes	6. AML, C 54 54 a 54 b 54 c 55 d 55 c 55 d 55 c 55 d 55 e 55 f 55 a	to the answers in this section.  ITF & SANCTIONS RISK ASSESMENT  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
57 d Geography Yes	6. AML, C 54 54 a 54 b 54 c 54 d 55 c 55 d 55 c 55 d 55 c 55 d 55 e 55 f 55 a 56 h 56 56 a	to the answers in this section.  ITF & SANCTIONS RISK ASSESMENT  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
58 Does the Entity's Sanctions EWRA cover the controls	6. AML, C  54  54 a  54 b  54 c  54 d  55 c  55 a  55 c  55 d  55 c  55 d  55 c  55 d  55 f  55 a  57 c	to the answers in this section.  ITF & SANCTIONS RISK ASSESMENT  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
effectiveness components detailed below:	6. AML, C 54 54 a 54 b 54 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 f 55 g 56 h 56 57 57 a 57 a 57 d	to the answers in this section.  TF & SANCTIONS RISK ASSESMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
	6. AML, C 54 54 a 54 b 54 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 f 55 g 56 h 56 57 57 a 57 a 57 d	to the answers in this section.  ITF & SANCTIONS RISK ASSESMENT  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
	6. AML, C  54  54 a  54 b  54 c  54 d  55 c  55 f  55 c  57 d  57 c  57 d  58	to the answers in this section.  ITF & SANCTIONS RISK ASSESMENT  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
D6 D   Governance   Tes	6. AML, C' 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h 56 56 57 a 57 c 57 d 58	to the answers in this section.  ITF & SANCTIONS RISK ASSESSMENT  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
	6. AML, C 54 54 a 54 b 54 c 54 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h 56 57 a 57 a 57 a 57 c 57 d 58 58 a 58 b	to the answers in this section.  TF & SANCTIONS RISK ASSESMENT  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
58 c List Management Yes	6; AML, C 54 54 a 54 b 54 c 54 c 55 d 55 c 55 a 55 c 55 d 55 c 55 d 55 c 55 f 55 g 56 h 56 57 a 57 a 57 b 57 c 57 d 58 58 a 58 c	to the answers in this section.  ITF & SANCTIONS RISK ASSESMENT  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 List Management	Yes
	to the state of th	ANCTIONS RISK ASSESSMENT  es the Entity's AML & CTF EWRA cover the inherent components detailed below:  Client Product Channel Geography es the Entity's AML & CTF EWRA cover the controls interest 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 In he Entity's AML & CTF EWRA been completed in last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  es the Entity's Sanctions EWRA cover the inherent components detailed below:  Client Product Channel Geography es the Entity's Sanctions EWRA cover the controls ctiveness components detailed below:	Yes
56 D GOVERNANCE TYES	6, AML, C 54 54 a 54 b 54 c 54 d 555 55 c 55 d 55 c 55 d 55 e 55 f 55 a 56 h 56 57 57 a 57 b 57 c 57 d 58	to the answers in this section.  ITF & SANCTIONS RISK ASSESSMENT  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
	6. AML, C 54 54 a 54 b 54 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 f 55 g 56 h 56 57 57 a 57 a 57 d 58 58 a 58 b	to the answers in this section.  TF & SANCTIONS RISK ASSESMENT  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
	6. AML, C 54 54 a 54 b 54 c 54 c 55 a 55 a 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h 56 57 a 57 a 57 a 57 a 57 a 58 a 58 a 58 a	to the answers in this section.  ITF & SANCTIONS RISK ASSESMENT  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 List Management	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	Yes
	last 12 months?	res
59 a	If N, provide the date when the last Sanctions EWRA	
	was completed,	
	Confirm that all responses provided in the above Section	
60		Yes
	are representative of all the LE's branches	
60 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context	
	to the answers in this section.	
	CDD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	
	CDD must be completed, e.g., at the time of onboarding	Yes
	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:	
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	
00	beneficial ownership identification?	25%
67	Does the due diligence process result in customers	
07	receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the	
0/ a	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
Brook and the second	Legal Entity type	Yes
67 a4 67 a5	Adverse Information	Yes
and the same of th	Olher (specify)	100
67 a6	Ottlet (specify)	
		PEP status
68	For high risk non-individual customers, is a site visit a part	Vog
	of your KYC process?	168
68 a	If Y, is this at:	
68 a1	Onboarding	
68 a2	KYC renewal	
68 a3	Trigger event	Yes
68 a4	Other	Yes
68 a4a	If yes, please specify "Other"	
00 a+a	ii yoo, piodoo spooliy Otiloi	
		During a loan research
		<u> </u>
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
-0.02	THE TOTAL	

	- N	
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?	Compliation of advinage and mandal
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?	res
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?	
12	Title to the method about by the Entity to delect 1 Et 3;	Combination of automated and manual
70	Dage the Entity have policies presedures and presents	
73	Does the Entity have policies, procedures and processes	
	to review and escalate potential matches from screening	L.
	customers and connected parties to determine whether	Yes
	they are PEPs, or controlled by PEPs?	
	1100	
74	Is KYC renewed at defined frequencies based on risk	Yes
	rating (Periodic Reviews)?	
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	No
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	Arris, deterice, military	Prohibited
76 b	Respondent Banks	Do not have this category of customer or industry
76 b1	If EDD or restricted, does the EDD assessment	
	contain the elements as set out in the Wolfsberg	
	Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	Always subject to EDD
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	EDD on risk-based approach
	Marijuana-related Entities	Prohibited Prohibited
76 g	MSB/MVTS customers	
76 h		Always subject to EDD
76 i	Non-account customers	Always subject to EDD
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	Always subject to EDD
761	Nuclear power	Prohibited
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	DED Deleted	Always subject to EDD
	PEP Related	
	Precious metals and stones	EDD on risk-based approach
76 q	Precious metals and stones	
76 q 76 r	Precious metals and stones Red light businesses/Adult entertainment	Prohibited
76 q 76 r 76 s	Precious metals and stones  Red light businesses/Adult entertainment  Regulated charities	Prohibited EDD on risk-based approach
76 q 76 r 76 s 76 t	Precious metals and stones  Red light businesses/Adult entertainment  Regulated charities  Shell banks	Prohibited EDD on risk-based approach Prohibited
76 q 76 r 76 s 76 t 76 u	Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach
76 q 76 r 76 s 76 t 76 u 76 v	Precious metals and stones  Red light businesses/Adult entertainment  Regulated charities  Shell banks  Travel and Tour Companies  Unregulated charities	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited Prohibited
76 q 76 r 76 s 76 t 76 u 76 v 76 w	Precious metals and stones  Red light businesses/Adult entertainment  Regulated charities  Shell banks  Travel and Tour Companies  Unregulated charities  Used Car Dealers	Prohibited EDD on risk-based approach
76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 x	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	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited Prohibited
76 q 76 r 76 s 76 t 76 u 76 v 76 w	Precious metals and stones  Red light businesses/Adult entertainment  Regulated charities  Shell banks  Travel and Tour Companies  Unregulated charities  Used Car Dealers	Prohibited EDD on risk-based approach
76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 x	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	Prohibited EDD on risk-based approach Always subject to EDD
76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 x	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	Prohibited EDD on risk-based approach
76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 x	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	Prohibited EDD on risk-based approach Always subject to EDD
76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 x 76 y	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)	Prohibited EDD on risk-based approach Always subject to EDD
76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 x	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	Prohibited EDD on risk-based approach Always subject to EDD
76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 x 76 y	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)	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Always subject to EDD
76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 x 76 y	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)	Prohibited EDD on risk-based approach Always subject to EDD
76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 x 76 y	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)	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Always subject to EDD
76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 w 76 x 77 y	Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)  If restricted, provide details of the restriction	Prohibited EDD on risk-based approach Always subject to EDD  N/A  In accordance with the Bank's KYC/EDD procedure, which are in line with FATF Recommendation 10
76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 x 76 y	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)	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Always subject to EDD

78 a	If Y indicate who provides the approval:	Compliance
79	Does the Entity have specific procedures for onboarding	
	entities that handle client money such as lawyers, accountants, consultants, real estate agents?	No
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	N/A
82	If appropriate, provide any additional information/context to the answers in this section.	N/A
8. MONI	TORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	Referrals from branches and other front offices of suspicious customer behaviour are forwarded to compliance officers
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Vendor-sourced tools
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	The name of the vendor is CustomerXPs /Clari5 AML/
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	N/A
	×0 =	N/A
91	If appropriate, provide any additional information/context to the answers in this section.	N/A
91		

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	Central Bank regulations on Preventative Measures regarding Money Laundering and Terrorism Financing (2019)
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.	7
97	If appropriate, provide any additional information/context to the answers in this section.	N/A
10. SANCT	TIONS	
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)?	
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?	Both Automated and Manual
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?	The name of the vendor is CustomerXPs /Clari5 AML/
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?	Combination of automated and manual
105	Does the Entity have a data quality management programme to ensure that complete data for all	Yes
106	transactions are subject to sanctions screening?  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 fillering 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 fillering transactional data
106 f	Other (specify)	The list issued by the Mongolian government
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
110	If appropriate, provide any additional information/context to the answers in this section.	N/A
11. 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	No
112 f	Non-employed workers (contractors/consultants)	No
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	Yes
	and Sanctions staff?	
	and Sanctions staff?  If Y, how frequently is training delivered?	Annually
114 a		Annually Yes

115 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	N/A
		1.07.3
116	If appropriate, provide any additional information/context	
	to the answers in this section,	N/A
Postario de la constanta de la		
	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from	Ven
	the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based	
110	Compliance Testing process (separate from the	Yes
	independent Audit function)?	
119	Confirm that all responses provided in the above Section	Yes
110	are representative of all the LE's branches	
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	and the branchies that this applies to,	N/A
120	If appropriate, provide any additional information/context	
120	to the answers in this section.	
		N/A
13. AUDIT		
121	In addition to inspections by the government	
121	supervisors/regulators, does the Entity have an internal	
	audit function, a testing function or other independent	Yes
	third party, or both, that assesses FCC AML, CTF, ABC,	165
	Fraud and Sanctions policies and practices on a regular basis?	
400	How often is the Entity audited on its AML, CTF, ABC,	
122	Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	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	Yes
123 b	procedures 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 Transaction Monitoring	Yes Yes
123 i	Transaction Morntoning  Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123 I	Other (specify)	
		AUA
		N/A
		0
124	Are adverse findings from internal & external audit	
	tracked to completion and assessed for adequacy and	Yes
405	completeness?	
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.	
		N/A
126	If appropriate, provide any additional information/context	
	to the answers in this section.	
		N/A
		<u> </u>
14. FRAU	ID.	
127	Does the Entity have policies in place addressing fraud	Van
	risk?	Yes
128	Does the Entity have a dedicated team responsible for	Yes
	preventing & detecting fraud?	

129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
132	If appropriate, provide any additional information/context to the answers in this section.	N/A

## **Declaration Statement**

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)
Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)

(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

(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.

(MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

2025/03/11

(Signature & Date)