

Financial Institution Name:	
Location (Country) :	

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	
2	Append a list of foreign branches which are covered	
	by this questionnaire	None, Bank Cler Ltd has no presence outside of Switzerland
3	Full Legal (Registered) Address	
4	Full Primary Business Address (if different from	
	above)	
5	Date of Entity incorporation/establishment	
	and the second s	
6	Select type of ownership and append an ownership	
	chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	
	,	
6 b	Member Owned/Mutual	
6 c	Government or State Owned by 25% or more	
6 d	Privately Owned	
6 d1	If Y, provide details of shareholders or ultimate	Book Clay I tid is a private company whose shares are fully surred (4009/) by Booky Kostonelbook
	beneficial owners with a holding of 10% or more	Bank Cler Ltd is a private company whose shares are fully owned (100%) by Basler Kantonalbank (short "BKB"). As BKB is a public law institution incorporated by law of the Canton of Basel-Stadt.
		(**** ) ***
7	% of the Entity's total shares composed of bearer	
	shares	0 %
8	Does the Entity, or any of its branches, operate under	
ľ	an Offshore Banking License (OBL)?	
8 a	If Y, provide the name of the relevant branch/es	
o a	which operate under an OBL	
9	Does the Bank have a Virtual Bank License or	
ľ	provide services only through online channels?	
10	Name of primary financial regulator/supervisory	
	authority	
11	Provide Legal Entity Identifier (LEI) if available	
' '	Trovide Legal Littly Identifier (LEI) II available	
12	Drovide the full legal name of the ultimate way of the	
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	
	different from the Entity completing the DDQ)	
<u> </u>		

13	Jurisdiction of licensing authority and regulator of	
	ultimate parent	
	F	
1		
14	Select the business areas applicable to the Entity	
	1.1	
14 a	Retail Banking	
14 b	Private Banking	
14 c	Commercial Banking	
14 d	Transactional Banking	
	ű	
14 e	Investment Banking	
14 f	Financial Markets Trading	
14 g	Securities Services/Custody	
14 h	Broker/Dealer	
14 i	Multilateral Development Bank	
14 j	Wealth Management	
14 k	Other (please explain)	
	(process support)	
<u> </u>	<u> </u>	
15	Does the Entity have a significant (10% or more)	
1	portfolio of non-resident customers or does it derive	
1	more than 10% of its revenue from non-resident	
1	customers? (Non-resident means customers primarily	
1	resident in a different jurisdiction to the location	
1		
1	where bank services are provided)	
45 :	KV mandal that is	
15 a	If Y, provide the top five countries where the non-	
1	resident customers are located.	
1	1	
1	1	
	<u>                                       </u>	<u> </u>
16	Select the closest value:	
16 a	Number of employees	
	. ,	
16 b	Total Assets	
17	Confirm that all responses provided in the above	
1	Section are representative of all the LE's branches.	
17 -	•	
17 a	If N, clarify which questions the difference/s relate to	
1	and the branch/es that this applies to.	
1		
Í	į J	
∟	<u>                                       </u>	<u> </u>
18	If appropriate, provide any additional	
	information/context to the answers in this section.	
1	and anomore in this section.	
1	1	
1	1	
2 DDCD	CTS & SEDVICES	
	CTS & SERVICES	
19	Does the Entity offer the following products and	
1	services:	
19 a	Correspondent Banking	
10 1	1637	
19 a1	IfY	
19 a1a	Does the Entity offer Correspondent Banking	
Í	services to domestic banks?	
10 -15	Does the Entity allow domestic bank clients to	
19 a1b	1	
L	provide downstream relationships?	<u> </u>
19 a1c	Does the Entity have processes and procedures	
1 -	in place to identify downstream relationships with	
1	domestic banks?	
<u> </u>		
19 a1d	Does the Entity offer Correspondent Banking	
1	services to foreign banks?	
19 a1e	Does the Entity allow downstream relationships	
Jaie		
	with foreign banks?	
19 a1f	Does the Entity have processes and procedures	
l -	in place to identify downstream relationships with	
1	1 ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' '	
	foreign banks?	
19 a1g	Does the Entity offer Correspondent Banking	
3	services to regulated Money Services Businesses	
1		
	(MSBs)/Money Value Transfer Services (MVTSs)?	
19 a1h	Does the Entity allow downstream relationships	
1	with MSBs, MVTSs, or Payment Service Provider	
1	(PSPs)?	
L	, ,	
19 a1h1	MSBs	
19 a1h2	MVTSs	
19 a1h3	PSPs	

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	
40.5		
19 b 19 c	Cross-Border Bulk Cash Delivery	
19 C	Cross-Border Remittances  Domestic Bulk Cash Delivery	
19 a	Hold Mail	
19 e	International Cash Letter	
	Low Price Securities	
19 g		
19 h 19 i	Payable Through Accounts  Payment services to non-bank entities who may	
191	then offer third party payment services to their customers?	
19 i1	If Y , please select all that apply below?	
19 i2	Third Party Payment Service Providers	
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	
19 j	Private Banking	
19 k	Remote Deposit Capture (RDC)	
19 I	Sponsoring Private ATMs	
19 m	Stored Value Instruments	
19 n	Trade Finance	
19 o	Virtual Assets	
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	
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	
19 p4a	If yes, state the applicable level of due diligence	
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	
20 a	If N, clarify 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.	
3. AML, C	TF & SANCTIONS PROGRAMME	
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	
22 b	Adverse Information Screening	
22 c	Beneficial Ownership	
22 d	Cash Reporting	
22 e	CDD	
22 f	EDD	
22 g	Independent Testing	
22 h	Periodic Review	
22 i	Policies and Procedures	
22 j	PEP Screening	
22 k	Risk Assessment	
22 I	Sanctions	

27 Taming and Excellent 28 How many full sine employees are in the Entity's MAL, CTF & Sanctions Deployees are in the Entity's AMA, CTF & Sanctions Deployees are in the Entity's AMA, CTF & Sanctions Deployees are in the Entity's AMA, CTF & Sanctions Deploy approved attested annually by the Book or equivalent Review of the CTF & Sanctions Deploy approved attested annually by the Book or equivalent Review or experience in Cuestion 29.  28 Dees the Sourd receive, seases, and challenge purposes or experience or consistency or equivalent Review or experience or experi	22 m	Suspicious Activity Reporting	
22 a many full stime employees are in the Entity's AMU, CTF & Sanctions Compliance (Part AMU, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Monagement (Part AMU, CTF & Sanctions policy product at least annually by the Board or equivalent Senior Monagement (Part AMU, CTF & Sanctions policy product at least annually by the Board or equivalent Senior Monagement (Part AMU, CTF, & Sanctions programme?)  25			
ANL, CF & Sanctions policy agreement in the Entity's ANL, CF & Sanctions policy approved at steet annually by the Board or equivalent Senior in Cuestion 2.  See the Board receive, was asses, and of balleage regular reporting on the status of the ANL, CF & Sanctions policy approved at steet annually by the Board receive, was seen and or sequivalent policy and the status of the ANL, CF & Sanctions programme?  Board receive, was seen and or sequivalent policy require reporting on the status of the ANL, CF & Sanctions programme?  Board receive, was the Board receive, was seen and or sequivalent policy or components of the ANL, CF & Sanctions programme?  Board Receive and the ANL, CF & Sanctions programme?  Board Receive and the ANL of the Sanctions programme?  Board Receive and the Sanctions of the Sanctions programme?  Board Receive and the Sanctions of the Sanctions programme?  If appropriate, provide any additional information of the Sanctions o		· ·	
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regular reporting on the satus of the AML_CTF, & Sanctions programme?  26	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	
components of the AML, CTF & Sanctions programme?  If Y, provide further details  If Y, provide further details  If Y, provide further details  Confirm that all responses provided in the above Section are representative of all the LES tranches  Section are representative of all the LES tranches  If N, Clarify which questions the difference's relate to and the branch'se that this applies to.  If A, Clarify which questions the difference's relate to and the branch'se that this applies to.  If Appropriate, provide any additional information information context to the answers in this section.  If appropriate, provide any additional information and in	25	regular reporting on the status of the AML, CTF, &	
27 Does the entity have a whistleblower policy? 28 Confirm that all responses provided in the above Section are representative of all the LEP tranches Section are representative of all the LEP tranches. 28 a If N, darify which questions the difference's relate to and the tranches that this applies to.  29 If appropriate, provide any additional information-context to the answers in this section.  29 If appropriate, provide any additional information-context to the answers in this section.  20 ANTI BRIBERY & CORRUPTION 30 Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and sport bibdry and corruption?  31 Does the Entity have an enterprise wide programme that sets minimum ABC standards?  32 Has the Entity appointed a designated officer or officers with sufficient representative propriative separative to the Entity have adjusted in a propriate to the Entity have adjusted and appropriate to the Entity have adjusted and appropriate to the Entity have adjusted and propriate to the Entity have adjusted and propriate to the Entity have adjusted and propriate to the Entity have adjusted ABC programme?  33 Does the Entity have adjusted ABC policy that:  35 Des the Entity have adjusted ABC policy that:  36 Prohibits the giving and receiving of brines? This includes promising, ordering, giving, solicitation or receiving of anything of value, clientify or indirectly, if improperly intended to influence addition or obtain an advertinge.  36 Des the Entity have adjusted to influence addition or obtain an advertinge.  37 Does the Entity have controls in place to monitor the effectiveness of the ABC programme?  38 If If provide the date to when the last ABC EVRA was completed.  40 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent ri	26		
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components detailed below:  40 a Potential liability created by intermediaries and		is the net result of the controls effectiveness and the inherent risk assessment?	
		components detailed below:	
	40 a		

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	
40 e	Changes in business activities that may materially increase the Entity's corruption risk	
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	
42 b	1st Line of Defence	
42 c	2nd Line of Defence	
42 d	3rd Line of Defence	
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	
42 f	Non-employed workers as appropriate (contractors/consultants)	
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	
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.	
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	
46 b	Terrorist financing	
46 c	Sanctions violations	
47	Are the Entity's policies and procedures updated at least annually?	
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	
48 b1	If Y, does the Entity retain a record of the results?	
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	
49 c	Prohibit dealing with other entities that provide	
	banking services to unlicensed banks	
49 d	banking services to unlicensed banks  Prohibit accounts/relationships with shell banks	
49 d 49 e		
	Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides	
49 e	Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for	

49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	
49	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	
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	
49 n	Outline the processes for the maintenance of internal "watchlists"	
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	
51	Does the Entity have record retention procedures that comply with applicable laws?	
51 a	If Y, what is the retention period?	
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	
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 AMI CT	F & SANCTIONS RISK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 a	Client	
54 b	Product	
54 c	Channel	
54 d	Geography	
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
55 a	Transaction Monitoring	
55 b	Customer Due Diligence	
55 c	PEP Identification	
55 d	Transaction Screening	
55 e	Name Screening against Adverse Media/Negative News	
55 f	Training and Education	
55 g 55 h	Governance Management Information	
56 n	Management Information  Has the Entity's AML & CTF EWRA been completed	
l————	in the last 12 months?	
56 a		
57	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:	
57 57 a	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	
57 57 a 57 b	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	
57 57 a 57 b 57 c	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	
57 a 57 b 57 c 57 d	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	
57 a 57 b 57 c 57 d 58	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:	
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		<u> </u>	
69 a2   KYC renewal		· ·	
	69 a2	KYC renewal	

69 a3	Trigger event	
69 a3 70	Trigger event	
	What is the method used by the Entity to screen for Adverse Media/Negative News?	
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?	
71 a	If Y, is this at:	
71 a1	Onboarding	
71 a2	KYC renewal	
71 a3	Trigger event	
72	What is the method used by the Entity to screen PEPs?	
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?	
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	
74 a	If yes, select all that apply:	
74 a1	Less than one year	
74 a2	1 – 2 years	
74 a3	3 – 4 years	
74 a4 74 a5	5 years or more  Trigger-based or perpetual monitoring reviews	
74 a5 74 a6	Other (Please specify)	
7440	Outer (Frease specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	
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	
76 b	Respondent Banks	
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	
76 d	Extractive industries	
76 e	Gambling customers	
76 f	General Trading Companies	
76 g	Marijuana-related Entities	
76 h	MSB/MVTS customers	
76 i	Non-account customers	
76 j	Non-Government Organisations	
76 k	Non-resident customers	
76 I	Nuclear power	
76 m	Payment Service Providers	
76 n	PEPs	
76 o	PEP Close Associates	
76 p	PEP Related	
76 q	Precious metals and stones	
76 r	Red light businesses/Adult entertainment	
76 s	Regulated charities	
76 t	Shell banks	
76 u	Travel and Tour Companies	
76 v	Unregulated charities	
76 w	Used Car Dealers	
76 x 76 y	Virtual Asset Service Providers Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	

70 -	If N in all and a substantial and have a supply	
78 a	If Y indicate who provides the approval:	
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	
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.	
8. MONIT	DRING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	
84	What is the method used by the Entity to monitor transactions for suspicious activities?	
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?	
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	
84 b2	When was the tool last updated?	
84 b3	When was the automated Transaction Monitoring application last calibrated?	
85	Does the Entity have regulatory requirements to report suspicious transactions?	
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	
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.	
O DAVME	NT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group	
	Payment Transparency Standards?	

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
00 -	'	
93 a	FATF Recommendation 16	
93 b	Local Regulations	
93 b1	If Y, specify the regulation	
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	
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. SANC	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?	
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?	
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	
102	What is the method used by the Entity for sanctions screening?	
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	
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)	
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?	
104	What is the method used by the Entity?	

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	
106 с	Office of Financial Sanctions Implementation HMT (OFSI)	
106 d	European Union Consolidated List (EU)	
106 e	Lists maintained by other G7 member countries	
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	
107 b	Transactions	
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?	
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	
109 а	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	
11. TRAININ	IG & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	
111 e	Conduct and Culture	
111 f	Fraud	
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	
112 b	1st Line of Defence	
112 c 112 d	2nd Line of Defence  3rd Line of Defence	
112 d	Third parties to which specific FCC activities have been outsourced	
112 f	Non-employed workers (contractors/consultants)	
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	
114 a	If Y, how frequently is training delivered?	
115	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches	

### 18 A DEAD ### 18 ADDRESS AND ADDRESS A			
Information/context to the answers in this section.	115 a		
Information/context to the answers in this section.			
117 Does the Entity have a program with ents based Outlief Assurance programs for financial crime (separats from the independent Audit function)?  118 Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?  119 Sociolismo Testing process (separate from the independent Audit function)?  110 Confirm that all responses provided in the above Sociolismo are impressed with a separate from the independent Audit function)?  110 and the trendship in his applier to a separate from the separate from the independent Audit function of all the LES branches  110 and the trendship in his applier to a separate from the s	116		
Cuality Assurance programme for financial crime (expanse from the independent Audit function)?  118 Does the Entity have a program wide risk based Compliance Testing process (expanse from the independent Audit function)?  119 Confirm that all responses provided in the above Section are representative of all the LES branches  119 If appropriate, provide any additional information content to another than applies to and the branches that this applies to.  120 If appropriate, provide any additional information/context to the answers in this section.  121 Individion to inspections by the government supervisor/regulation, does the Entity have an internal audit function, a setting function or other independent third party, or both, that assesses FCC AML CTF. ABC, Fraud and Sanctions proteins and sections programme by the following:  122 How their is the Entity audition or its AML CTF. ABC, Fraud and Sanctions proteins and practices on a regular bases?  122 External Third Party  123 Does the Internal Audit Department  124 A through the Company of the Internal Audit Department  125 Destination of the Internal Audit Department  126 Internal Third Party  127 A through the Internal Audit Department  128 A Through the Internal Audit Department  129 A AML CTF. ABC, Fraud and Sanctions policy and procedures  129 A AML CTF. ABC, Fraud and Sanctions policy and procedures  129 A AML CTF. ABC, Fraud and Sanctions policy and procedures  129 A AML CTF. ABC, Fraud and Sanctions policy and procedures  129 A AML CTF. ABC, Fraud and Sanctions policy and procedures  129 A AML CTF. ABC, Fraud and Sanctions policy and procedures  129 A AML CTF. ABC, Fraud and Sanctions policy and procedures  129 A AML CTF. ABC, Fraud and Sanctions policy and procedures  129 A AML CTF. ABC, Fraud and Sanctions policy and procedures  129 A AML CTF. ABC, Fraud and Sanctions policy and procedures  129 A AML CTF. ABC, Fraud and Sanctions policy and procedures the Internal & submala audit through the Internal Sanctions policy and completences of the ABC policy	12. QUALI	TY ASSURANCE /COMPLIANCE TESTING	
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Compliance Testing process (separate from the independent Audit Introduction?)?  119 Confirm that all responses provided in the above Section are representative of all the LES branches  119 a If N, Catrify which questions the difference's relate to and the branchies that this applies to.  120 If appropriate, provide any additional information/context to the answers in this section.  121 If appropriate, provide any additional information/context to the answers in this section.  122 If a laddition to inspections by the government supervisors/regulators, does the Entity have an intend and util function a sessing function or other independent intends and util function. It is sessing function or other independent intends and util function a sessing function or other independent intends and sentiments and senti		(separate from the independent Audit function)?	
Section are representative of all the LE's branches		Compliance Testing process (separate from the	
and the branchies that this applies to.    Tappropriate, provide any additional information/context to the answers in this section.    Table		Section are representative of all the LE's branches	
information/context to the answers in this section.  13. AUDIT  121 In addition to inspections by the government superviscos/regulators, does the Entity have an independent full regulation, of the Entity have an independent full regulation of the context of the	119 a		
In addition to inspections by the government	120		
In addition to inspections by the government	13. AUDIT		
Fraud and Sanctions programme by the following:  122 b		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	
External Third Party   Does the Internal audit function or other independent third party over the following areas:   133 a	122		
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 123 b Enterprise Wide Risk Assessment 123 c Governance 123 d KYC/CDD/EDD and underlying methodologies 123 e Name Screening & List Management 123 f Reporting/Metrics & Management Information 123 g Suspicious Activity Filling 123 h Technology 123 i Transaction Monitoring 123 i Transaction Screening including for sanctions 123 k Transing & Education 123 l Transaction Screening including for sanctions 123 k Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 a If N, Clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible	122 a	Internal Audit Department	
third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures  23 a AML, CTF, ABC, Fraud and Sanctions policy and procedures  23 c Governance  23 d KYC/CDD/EDD and underlying methodologies  123 e Name Screening & List Management  123 f Reporting/Metrics & Management Information  23 g Suspicious Activity Filling  123 h Technology  123 h Transaction Monitoring  123 j Transaction Monitoring  123 j Transaction Screening including for sanctions  123 l Training & Education  Other (specify)  124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  125 a Confirm that all responses provided in the above section are representative of all the LE's branches  125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.	122 b	External Third Party	
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127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible	14. FRAL	JD	
		Does the Entity have policies in place addressing fraud risk?	
	128		

129	Does the Entity have real time monitoring to detect fraud?			
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?			
131	Confirm that all responses provided in the above section are representative of all the LE's branches			
131 а	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.			
<u>Declaratio</u>	n Statement			
Declaration St	up Correspondent Banking Due Diligence Questionnaire 2023 (CE atement (To be signed by Global Head of Correspondent Bank aundering, Chief Compliance Officer, Global Head of Financial	king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of		
(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.				
	Institution understands the critical importance of having effective latory obligations.	ve and sustainable controls to combat financial crime in order to protect its reputation and to meet its		
The Financial standards.	Institution recognises the importance of transparency regardin	g parties to transactions in international payments and has adopted/is committed to adopting these		
	Institution further certifies it complies with / is working to compl on provided in this Wolfsberg CBDDQ will be kept current and w	y with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. vill be updated no less frequently than every eighteen months.		
The Financial	Institution commits to file accurate supplemental information on	a timely basis.		
I, the answers p Institution.		of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that my honest belief, and that I am authorised to execute this declaration on behalf of the Financial		
I, Wolfsberg CB		ivalent), certify that I have read and understood this declaration, that the answers provided in this am authorised to execute this declaration on behalf of the Financial Institution.		
	(Signature & Dat	e)		
	(Signature & Dat	e)		