the Wolfsberg Group

Financial Institution Name: Location (Country) : AI SALAM BANK B.S.C KINGDOM OF BAHRAIN

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.

2	Append a list of foreign branches which are covered by this questionnaire	AL SALAM BANK B.S.C
3	Append a list of foreign branches which are covered by this questionnaire	N/A
3	Append a list of foreign branches which are covered by this questionnaire	N/A
3	this questionnaire	
3	this questionnaire	
	this questionnaire	
	Full Legal (Registered) Address	
	Full Legal (Registered) Address	
4		
4		FLAT 11 - BUILDING 935 - ROAD 1015 - Block 410 SANABIS
4		KINGDOM OF BAHRAIN
4		
	Full Primary Business Address (if different from above)	
		SAME AS ABOVE
		SAIVIE AS ABOVE
5	Date of Entity incorporation/establishment	
		19/01/2006
		13/01/2000
6	Select type of ownership and append an ownership	
	chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	EXCHANGE: BAHRAIN BOURSE SYMBOL: SALAM
		EXCHANGE: DUBAI FINANCIAL MARKET SYMBOL: SALAM_BAH
6 b	Member Owned/Mutual	No
6 с	Government or State Owned by 25% or more	No
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	lana
		N/A
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)?	NO .
8 a	If Y, provide the name of the relevant branch/es which	
	operate under an OBL	laus.
		N/A
9	Does the Bank have a Virtual Bank License or provide	no
40	services only through online channels?	
10	Name of primary financial regulator/supervisory authority	
		CENTRAL BANK OF BAHRAIN
		https://www.cbb.gov.bh/
11	Provide Legal Entity Identifier (LEI) if available	
		 549300289UWVLHMQVV09
		0700002030 44 4 ENIVIQ 4 4 03
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	100
		N/A
	lurindiation of lineaging authority and annulated of	<u></u>
13	journation of licensing authority and regulator of	
13	Jurisdiction of licensing authority and regulator of ultimate parent	
13		N/A
13		N/A
13		N/A

	Private Banking	Yes
14 b	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	No
14 j	Wealth Management	Yes
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		
16	Select the closest value:	CO1 1000
16 a	Number of employees	501-1000
16 b	Total Assets Confirm that all responses provided in the above Section	Greater than \$500 million
	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.	FOR ADDITIONAL INFORMATION: https://www.alsalambank.com/en/MediaCenter/downloads
	to the answers in this section.	FOR ADDITIONAL INFORMATION: https://www.alsalambank.com/en/MediaCenter/downloads
	to the answers in this section. JCTS & SERVICES Does the Entity offer the following products and	FOR ADDITIONAL INFORMATION: https://www.alsalambank.com/en/MediaCenter/downloads
2. PRODU	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services:	
2. PRODI 19	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking	FOR ADDITIONAL INFORMATION: https://www.alsalambank.com/en/MediaCenter/downloads Yes
2. PRODU	to the answers in this section. JCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking	
2. PRODU 19 19 a 19 a1	to the answers in this section. JCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to	Yes
2. PRODU 19 19 a 19 a 19 a1 19 a1a	to the answers in this section. JCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking 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	Yes Yes
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b	to the answers in this section. JCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking 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	Yes Yes No
2. PRODI 19 19 a 19 a 19 a1 19 a1a 19 a1b	to the answers in this section. JCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking 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?	Yes Yes No Yes
2. PRODU 19 19 a 19 a1 19 a1a 19 a1b 19 a1c	to the answers in this section. JCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking 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	Yes Yes No Yes Yes
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d	to the answers in this section. JCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking 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?	Yes Yes No Yes No Yes No
2. PRODU 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d	to the answers in this section. JCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking 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 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	Yes Yes No Yes Ves Ves Yes Yes
2. PRODI 19 19 a 19 a 19 a 19 a 19 a 10 a 10 a 10 a 10 a 10 a 10 a 10 a 10	to the answers in this section. JCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking 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 (PSPs)?	Yes Yes No Yes No Yes Ves No Yes
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d	to the answers in this section. JCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking 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 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	Yes Yes No Yes Yes Yes Yes Yes Yes No Yes

19 a1i	Does the Entity have processes and procedures in	
	place to identify downstream relationships with MSBs	Yes
40.1	/MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	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	
19 15	Other - Flease explain	
		N/A
19 j	Private Banking	Both
19 k	Remote Deposit Capture (RDC)	No No
19	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	Yes
19 n	Trade Finance	Yes
19 o	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:	[2] [2] [2] [2] [3] [4] [4] [4] [4] [4] [4] [4] [4] [4] [4
19 p1	Check cashing service	Yes
19 p1a	If yes, state the applicable level of due diligence	Identification and Verification
	Wire transfers	
19 p2		No
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	No
		IVO
19 p4a	If yes, state the applicable level of due diligence	THE REPORT OF THE PROPERTY OF
19 p5	If you offer other services to walk-in customers	
	please provide more detail here, including describing	
	the level of due diligence.	N/A
	the level of dde diligerice.	
	Other blate data and a series and a series at the office of the other	
19 a	I Uither high-risk hroducts and services identified by the	
19 q	Other high-risk products and services identified by the	
19 q	Entity (please specify)	Digital ophoarding and Licensed Crowd Funding accounts
19 q		Digital onboarding and Licensed Crowd Funding accounts
19 q		Digital onboarding and Licensed Crowd Funding accounts
	Entity (please specify)	
19 q	Entity (please specify) Confirm that all responses provided in the above Section	
	Entity (please specify)	
	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches.	
20	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to	
20	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
20	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to	
20	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to	Yes
20 20 a	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Yes
20	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Yes
20 20 a	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Yes N/A
20 20 a	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Yes
20 20 a	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Yes N/A
20 20 a	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Yes N/A
20 20 a	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Yes N/A
20 20 a 21 3. AML, C	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Yes N/A
20 20 a	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Yes N/A
20 20 a 21 3. AML, C	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the	Yes N/A
20 20 a 21 3. AML, C	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	Yes N/A N/A
20 20 a 21 3. AML, C	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the	Yes N/A
20 20 a 21 3. AML, C 22 22 a	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise	Yes N/A N/A Yes
20 20 a 21 3. AML, C 22 22 a 22 b	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening	Yes N/A N/A Yes Yes
20 20 a 21 3. AML, C 22 22 a 22 b 22 c	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership	Yes N/A N/A Yes Yes Yes Yes Yes
20 20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting	Yes N/A N/A Yes Yes Yes Yes Yes Yes
20 20 a 21 3. AML, C 22 22 a 22 b 22 c	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership	Yes N/A N/A Yes Yes Yes Yes Yes
20 20 a 21 3. AML, C 22 22 b 22 c 22 d 22 e	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD	Yes N/A N/A Yes Yes Yes Yes Yes Yes Yes Ye
20 20 a 21 21 22 a 22 b 22 c 22 d 22 f 22 f	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	Yes N/A N/A Yes Yes Yes Yes Yes Yes Yes Ye
20 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Yes N/A N/A Yes Yes Yes Yes Yes Yes Yes Ye
20 20 a 21 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review	Yes N/A N/A Yes Yes Yes Yes Yes Yes Yes Ye
20 20 a 21 3. AML, C 22 22 d 22 c 22 d 22 e 22 f 22 g 22 h 22 i	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes N/A N/A Yes Yes Yes Yes Yes Yes Yes Ye
20 20 a 21 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review	Yes N/A N/A Yes Yes Yes Yes Yes Yes Yes Ye
20 20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 j	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Yes N/A N/A Yes Yes Yes Yes Yes Yes Yes Ye
20 a 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 j 22 k	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment	Yes N/A N/A Yes Yes Yes Yes Yes Yes Yes Ye
20 20 a 21 3. AML, C 22 2 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 j	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Yes N/A N/A Yes Yes Yes Yes Yes Yes Yes Ye

22 n Training and Education Yes Yes Yes Yes Yes Yes Training and Education Training and Education Yes Training and Education Yes Training and Education Yes Training and Education Yes Training and Education Training and Education Yes Training and Education Yes Training and Education Yes Training and Education Yes Training and Education Management Committee? If N, describe your practice in Question 29. The Search of Yes Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme? Does the Entity with Find parties to carry out any components of its AML, CTF & Sanctions programme? If Y, provide further details N/A The Does the entity have a whistleblower policy? Yes Confirm that all responses provided in the above Section are representative of all the LES branches If N, clarify which questions the difference's relate to and the branch's that this applies to. N/A ANTI BRIBERY & CORRUPTION If appropriate, provide any additional information/context to the answers in this section. N/A ANTI BRIBERY & CORRUPTION The state Entity documented policies and procedures on scient with applicable ABC regulations and requirements to reasonably prevent, detect and report hibber and concupition? Has the Entity documented policies and procedures on scient with applicable ABC regulations and requirements to reasonably prevent, detect and report hibber and concupition? Has the Entity have an enterprise wide programme that sets minimum ABC standards? Yes Has the Entity have an enterprise wide programme that sets minimum ABC standards? Yes Set	
Yes	
How many full time employees are in the Entity's AML, CTF & Sanctions Combilance Department? Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee' If N, describe your practice in Question 29. Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme? Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme? Does the Inity use third parties to carry out any components of its AML, CTF & Sanctions programme? If Y, provide further details If Y, provide further details N/A Parameter of the entity have a whistleblower policy? The confirm that all responses provided in the above Section and the branch/es that this applies to. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. N/A ANTI BRIBERY & CORRUPTION If appropriate, provide any additional information/context to the answers in this section. N/A ANTI BRIBERY & CORRUPTION As the Entity have an enterprise wide programme that sets minimum ABC standards? Does the Entity have an enterprise wide programme that sets minimum ABC standards? Has the Entity appointed a designated officer or officers with sufficient experience/expertse to implement the ABC programme? Does the Entity have an enterprise wide programme that sets minimum ABC standards? Has the Entity appointed a designated officer or officers with sufficient experience/expertse to implement the ABC programme? The Probibitist region and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, effectly or indirectly, of the effects of the effect of the	
CTF & Sanctions Compliance Department? 4 Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29. 5 Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme? 26 Does the Entity base third parties to carry out any components of its AML, CTF & Sanctions programme? 27 Does the entity have a whistleblower policy? 28 Confirm that all responses provided in the above Section are representative of all the LE's branches 18 N/A 27 Does the entity have a whistleblower policy? 28 Confirm that all responses provided in the above Section are representative of all the LE's branches 19 If N, clarify which questions the difference's relate to and the branch'es that this applies to. N/A 4. ANTI BRIBERY & CORRUPTION 30 Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report publicable and Entity have an enterprise wide programme that sets minimum ABC standards? 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 experience/expertate to implement the ABC programme? 33 Does the Entity have a depute staff with appropriate levels of experience/expertate to implement the ABC programme? 34 Is the Entity ABC programme applicable to: 35 Does the Entity have a depute test of with the ABC programme applicable to: 36 In Prohibits the given and receiving of or bross? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, of the creating and received and the creating of anything of value, directly or indirectly, of the creating and received and the creating of anything of value, directly or indirectly or indir	
CTF & Sanctions Compliance Department? 4 Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29. 5 Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme? 26 Does the Entity base third parties to carry out any components of its AML, CTF & Sanctions programme? 27 Does the entity have a whistleblower policy? 28 Confirm that all responses provided in the above Section are representative of all the LE's branches 18 N/A 27 Does the entity have a whistleblower policy? 28 Confirm that all responses provided in the above Section are representative of all the LE's branches 19 If N, clarify which questions the difference's relate to and the branch'es that this applies to. N/A 4. ANTI BRIBERY & CORRUPTION 30 Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report publicable and Entity have an enterprise wide programme that sets minimum ABC standards? 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 experience/expertate to implement the ABC programme? 33 Does the Entity have a depute staff with appropriate levels of experience/expertate to implement the ABC programme? 34 Is the Entity ABC programme applicable to: 35 Does the Entity have a depute test of with the ABC programme applicable to: 36 In Prohibits the given and receiving of or bross? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, of the creating and received and the creating of anything of value, directly or indirectly, of the creating and received and the creating of anything of value, directly or indirectly or indir	
least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29. 25 Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme? 26 Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? 26 a If Y, provide further details N/A 27 Does the entity have a whistleblower policy? 28 Confirm that all responses provided in the above Section are representative of all the LE's branches 18 N, Caff Which questions the difference/s relate to and the branch/es that this applies to. N/A 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 occistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bithery and composition? 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 experience/expertise responsible for coordinating the ABC programme? 34 Is the Entity ABC programme applicable to: brown and composition or receiving of anything of value, directly or inclinety, if receiving of anything of value, directly or inclinety, if receiving of anything of value, directly or inclinety, if receiving of anything of value, directly or inclinety, if res	
Management Committee? If N, describe your practice in Question 29. Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme? Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? If Y, provide further details If Y, provide further details N/A Provide further details N/A If Y, provide further details N/A Confirm that all responses provided in the above Section are representative of all the LE's branches are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. N/A If appropriate, provide any additional information/context to the answers in this section. N/A ANTI BRIBERY & CORRUPTION A Las the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribary and comprolion? Does the Entity have an enterprise wide programme that sets minimum ABC standards? As the Entity appointed a designate officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? As the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? Prohibits the giving and receiving of bribes? This includes promising, offening, giving, solicitation or receiving of anything of value, directly or inclinedty, if yes	
Management Committee? If N, describe your practice in Question 29. Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme? Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? If Y, provide further details N/A If Y, provide further details N/A Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. N/A If appropriate, provide any additional information/context to the answers in this section. N/A ANTI BRIBERY & CORRUPTION A Las the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribary and commotion? Does the Entity have an enterprise wide programme that sets minimum ABC standards? A Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordination the ABC programme? A Boes the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? He be thing ABC programme applicable to: Both joint ventures and third parties acting on behalf of the Entity includes promising, offering, giving, solicitation or receiving of anything of value, directly or inclinectly, if ves	
Cuestin 28. Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme? Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? If Y, provide further details N/A Prohibits the Entity have a whistleblower policy? Test of the entity have a whistleblower policy? Test of the provide are representative of all the LE's branches If N, olarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. N/A If appropriate, provide any additional information/context to the answers in this section. N/A If appropriate, provide any additional information/context to the answers in this section. N/A If appropriate, provide any additional information/context to the answers in this section. N/A If appropriate, provide any additional information/context to the answers in this section. N/A If appropriate, provide any additional information/context to the answers in this section. N/A If appropriate, provide any additional information/context to the answers in this section. N/A If appropriate, provide any additional information/context to the answers in this section. N/A If appropriate, provide any additional information/context to the answers in this section. N/A If appropriate, provide any additional information/context to the answers in this section. N/A If appropriate, provide any additional information/context to the answers in this s	
Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme? Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? If Y, provide further details N/A If Y, provide further details N/A Does the entity have a whistleblower policy? Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. N/A If A, anti Bribery & Corruption If appropriate, provide any additional information/context to the answers in this section. N/A If A, anti Bribery & Corruption If appropriate, provide any additional information/context to the answers in this section. N/A If A, anti Bribery & Corruption If appropriate, provide any additional information/context to the answers in this section. N/A If A, anti Bribery & Corruption Does the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report hisbery and corruption? Does the Entity have an enterprise wide programme that sets minimum ABC standards? Has the Entity appointed a designated officer or officers with sufficient expertiser responsible for coordination the ABC programme? Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? A less the Entity ABC programme applicable to: Both joint ventures and third parties acting on behalf of the Entity includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if yes	
reporting on the status of the AML, CTF, & Sanctions programme? Dees the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? If Y, provide further details N/A If Y, provide further details N/A Pes Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference's relate to and the branch'es that this applies to. N/A If appropriate, provide any additional information/context to the answers in this section. N/A If appropriate, provide any additional information/context to the answers in this section. N/A ANTI BRIBERY & CORRUPTION I has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and compotion? Does the Entity have an enterprise wide programme that sets minimum ABC standards? Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordination the ABC programme? Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? Set Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: The Coordination of the Entity have a global ABC policy that: Set and the Entity's ABC programme applicable to: Pools the Entity have a global ABC policy that: The Entity's ABC programme applicable to: Pools the Entity have a global ABC policy that: The Coordination of the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if experience received anything of value, directly or indirectly, if experience received anything of value, directly or indirectly, if experience receiving of anything of value, directly or indirectly, if experience received anything of value, directly or indirectly, if	
Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? 26 a If Y, provide further details N/A 27 Does the entity have a whistleblower policy? 28 Confirm that all responses provided in the above Section are representative of all the LE's branches 18 A If N, clarly which questions the difference/s relate to and the branch/es that this applies to. N/A 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 requirements to reasonably prevent, detect and report bribery 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 experience/expertise responsible for coordinating the ABC programme? 33 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? 34 Is the Entity's ABC programme applicable to:	
Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? If Y, provide further details N/A If Y, provide further details N/A 27 Does the entity have a whistleblower policy? 28 Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. N/A 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 requirements to reasonably prevent, detect and report bribery and comunition? 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 experience/expertise responsible for coordination the ABC programme? 33 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? 34 Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: 35 Does the Entity have a global ABC policy that: The ABC programme applicable to: Both joint ventures and third parties acting on behalf of the Entity includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if experience/expertise free programmers and third parties acting on behalf of the Entity appointed programming anything of value, directly or indirectly, if experience/expertise free programmers and third parties acting on behalf of the Entity appointed programming anything of value, directly or indirectly, if experience/expertise free programmers and third parties acting on behalf of the Entity appointed programming anything of value, directly or indirectly, if experience/expertise free programmers and third parties acting on behalf of the Entity appointed anything of value, directl	
components of its AML, CTF & Sanctions programme? 26 a	
27 Does the entity have a whistleblower policy? 28 Confirm that all responses provided in the above Section are representative of all the LE's branches 28 a if N. clarify which questions the difference/s relate to and the branch/es that this applies to. 29 If appropriate, provide any additional information/context to the answers in this section. N/A 4. ANTI BRIBERY & CORRUPTION 30 Has the Entity documented policles and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? 31 Does the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? 32 Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? 33 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? 34 Is the Entity SABC programme applicable to: 35 Does the Entity have a global ABC policy that: 35 Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if yes	
27 Does the entity have a whistleblower policy? 28 Confirm that all responses provided in the above Section are representative of all the LE's branches 28 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. N/A 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 requirements to reasonably prevent, detect and report bribery and corruption? 31 Does the Entity have an enterprise wide programme that sets minimum ABC standards? 22 Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? 33 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? 34 Is the Entity's ABC programme applicable to: 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	
27 Does the entity have a whistleblower policy? 28 Confirm that all responses provided in the above Section are representative of all the LE's branches 28 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. N/A 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 requirements to reasonably prevent, detect and report bribery 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 experience/expertise responsible for coordinating the ABC programme? 33 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? 34 Is the Entity's ABC programme applicable to: 35 Does the Entity have a global ABC policy that: 35 Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if Yes	
27 Does the entity have a whistleblower policy? 28 Confirm that all responses provided in the above Section are representative of all the LE's branches 28 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. N/A 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 requirements to reasonably prevent, detect and report bribery 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 experience/expertise responsible for coordinating the ABC programme? 33 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? 34 Is the Entity's ABC programme applicable to: 35 Does the Entity have a global ABC policy that: 35 Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if Yes	
28 a Confirm that all responses provided in the above Section are representative of all the LE's branches 28 a If N, clarify which questions the difference's relate to and the branch/es that this applies to. N/A 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 requirements to reasonably prevent, detect and report bribery 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 experience/expertise responsible for coordinating the ABC programme? 33 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? 34 Is the Entity ABC programme applicable to: 35 Does the Entity have a global ABC policy that: 36 Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	
28 a Confirm that all responses provided in the above Section are representative of all the LE's branches 28 a If N, clarify which questions the difference's relate to and the branch/es that this applies to. N/A 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 requirements to reasonably prevent, detect and report bribery 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 experience/expertise responsible for coordinating the ABC programme? 33 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? 34 Is the Entity ABC programme applicable to: 35 Does the Entity have a global ABC policy that: 36 Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	
28 a Confirm that all responses provided in the above Section are representative of all the LE's branches 28 a If N, clarify which questions the difference's relate to and the branch/es that this applies to. N/A 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 requirements to reasonably prevent, detect and report bribery 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 experience/expertise responsible for coordinating the ABC programme? 33 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? 34 Is the Entity ABC programme applicable to: 35 Does the Entity have a global ABC policy that: 36 Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	
are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. N/A If appropriate, provide any additional information/context to the answers in this section. N/A If appropriate, provide any additional information/context to the answers in this section. N/A If appropriate, provide any additional information/context to the answers in this section. N/A If appropriate, provide any additional information/context to the answers in this section. N/A If appropriate, provide any additional information/context to the answers in this section. N/A If appropriate, provide any additional information/context to the answers in this section. N/A If appropriate, provide any additional information/context to the answers in this section. N/A If appropriate, provide any additional information/context to the answers in this applicable for equipments to reasonably prevent, detect and report bribers and requirements to reasonably prevent, detect and report bribers and requirements to reasonably prevent, detect and report bribers and requirements to reasonably prevent, detect and report bribers and requirements to reasonably prevent, detect and report bribers and requirements to reasonably prevent, detect and report bribers and requirements to reasonably prevent, detect and report bribers and requirements to reasonably prevent and requirements to reasonably prevent, detect and report bribers and requirements to the answers and requirements to the answers and requirements to the answers and third parties acting on behalf of the Entity Yes To be the Entity have a global ABC policy that: Does the Entity have a global ABC policy that: Does the Entity have a global ABC policy that: To be the Entity and requirements to the and requirements to the anameter and requirements to the anameter and third parties acting on behalf of the Entity and the anameter	
If N, clarify which questions the difference/s relate to and the branch/es that this applies to. N/A 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 requirements to reasonably prevent, detect and report bribery 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 experience/expertise responsible for coordinating the ABC programme? 33 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? 34 Is the Entity's ABC programme applicable to: 35 Does the Entity have a global ABC policy that: 36 Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if yes	
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 requirements to reasonably prevent, detect and report bribery and corruption? 31 Does the Entity have an enterprise wide programme that sets minimum ABC standards? 4 Has the Entity applicable of coordinating the ABC programme? 32 Has the Entity applicable of coordinating the ABC programme? 33 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? 34 Is the Entity's ABC programme applicable to: 35 Does the Entity have a global ABC policy that: 36 Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	
If appropriate, provide any additional information/context to the answers in this section. ANTI BRIBERY & CORRUPTION	
If appropriate, provide any additional information/context to the answers in this section. ANTI BRIBERY & CORRUPTION	
4. ANTI BRIBERY & CORRUPTION 30 Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? 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 experience/expertise responsible for coordinating the ABC programme? 33 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? 34 Is the Entity's ABC programme applicable to: 35 Does the Entity have a global ABC policy that: 36 Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	
4. ANTI BRIBERY & CORRUPTION 30 Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? 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 experience/expertise responsible for coordinating the ABC programme? 33 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? 34 Is the Entity's ABC programme applicable to: 35 Does the Entity have a global ABC policy that: 36 Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	
4. ANTI BRIBERY & CORRUPTION 30 Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? 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 experience/expertise responsible for coordinating the ABC programme? 33 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? 34 Is the Entity's ABC programme applicable to: 35 Does the Entity have a global ABC policy that: 36 Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	
4. ANTI BRIBERY & CORRUPTION 30 Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? 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 experience/expertise responsible for coordinating the ABC programme? 33 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? 34 Is the Entity's ABC programme applicable to: 35 Does the Entity have a global ABC policy that: 36 Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	
4. ANTI BRIBERY & CORRUPTION 30 Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? 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 experience/expertise responsible for coordinating the ABC programme? 33 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? 34 Is the Entity's ABC programme applicable to: 35 Does the Entity have a global ABC policy that: 36 Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	
Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? The sets minimum ABC standards? Has the Entity have an enterprise wide programme that sets minimum ABC standards? Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	
Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? The sets minimum ABC standards? Has the Entity have an enterprise wide programme that sets minimum ABC standards? Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	
Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? The sets minimum ABC standards? Has the Entity have an enterprise wide programme that sets minimum ABC standards? Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	
consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery 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 experience/expertise responsible for coordinating the ABC programme? 33 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? 34 Is the Entity's ABC programme applicable to: 35 Does the Entity have a global ABC policy that: 36 Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	
requirements to reasonably prevent, detect and report bribery 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 experience/expertise responsible for coordinating the ABC programme? 33 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? 34 Is the Entity's ABC programme applicable to: 35 Does the Entity have a global ABC policy that: 36 Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly, if	
bribery and corruption? Does the Entity have an enterprise wide programme that sets minimum ABC standards? Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? Set is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly, if	
Does the Entity have an enterprise wide programme that sets minimum ABC standards? Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	
sets minimum ABC standards? Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Both joint ventures and third parties acting on behalf of the Entity Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	
Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? 33 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? 34 Is the Entity's ABC programme applicable to: 35 Does the Entity have a global ABC policy that: 36 Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly, if	
with sufficient experience/expertise responsible for coordinating the ABC programme? 33 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? 34 Is the Entity's ABC programme applicable to: 35 Does the Entity have a global ABC policy that: 35 Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	
coordinating the ABC programme? Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	
Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Troilibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	
levels of experience/expertise to implement the ABC programme? 34	
programme? 34 Is the Entity's ABC programme applicable to: 35 Does the Entity have a global ABC policy that: 35 Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	
Is the Entity's ABC programme applicable to: Both joint ventures and third parties acting on behalf of the Entity	
Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	
Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	
includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	
receiving of anything of value, directly or indirectly, if	
recording or anything or rained, amount or manuscript, in	
improperly intended to influence action or obtain an	
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?	
On the Full Learner stell is also be as " "	
Does the Entity have controls in place to monitor the Yes	
leffectiveness of their ABC programme?	
Does the Board receive, assess, and challenge regular Yes	
reporting on the status of the ABC programme?	
38 Has the Entity's ABC Enterprise Wide Risk Assessment	
(EWRA) been completed in the last 12 months? Yes	
38 a If N, provide the date when the last ABC EWRA was	
completed. N/A	
["""	
39 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's ABC EWRA cover the inherent risk	
components detailed below:	
40 a Detential liability expeted by intermediaries and other	
third-party providers as appropriate	
40 b Corruption risks associated with the countries and	
industries in which the Entity does business, directly or Yes	
through intermediaries 40 c Transactions, products or services, including those	
that involve state-owned or state-controlled entities or	
public officials	
public officials 40 d Corruption risks associated with gifts and hospitality,	
public officials	

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	
41	independent third party cover ABC Policies and	Yes
		res
40	Procedures? Does the Entity provide mandatory ABC training to:	The state of the state of the contract of the state of th
42		· · · · · · · · · · · · · · · · · · ·
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	Not Applicable
	subject to ABC risk have been outsourced	Not Applicable
42 f	Non-employed workers as appropriate	Not Applicable
	(contractors/consultants)	Not Applicable
43	Does the Entity provide ABC training that is targeted to	Yes
	specific roles, responsibilities and activities?	Tes
44	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	Tes
44 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
	and the stations of that the appropriation	N/A
		1
45	If appropriate, provide any additional information/context	
	to the answers in this section.	
		N/A
5. AML,	CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
-	consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent,	
	detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 C	Sanctions violations	Yes
47		
47	Are the Entity's policies and procedures updated at least	Yes
	" 0	
40	annually?	
48	Has the Entity chosen to compare its policies and	
	Has the Entity chosen to compare its policies and procedures against:	
48 a	Has the Entity chosen to compare its policies and procedures against: U.S. Standards	No
48 a 48 a1	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results?	No Not Applicable
48 a	Has the Entity chosen to compare its policies and procedures against: U.S. Standards	No
48 a 48 a1	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results?	No Not Applicable
48 a 48 a1 48 b	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards	No Not Applicable No
48 a 48 a1 48 b 48 b1	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	No Not Applicable No Not Applicable
48 a 48 a1 48 b 48 b1 49	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and	No Not Applicable No
48 a 48 a1 48 b 48 b1 49	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts	No Not Applicable No Not Applicable Yes
48 a 48 a1 48 b 48 b1 49	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for	No Not Applicable No Not Applicable
48 a 48 a1 48 b 48 b1 49 49 a	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and ficitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	No Not Applicable No Not Applicable Yes Yes
48 a 48 a1 48 b 48 b1 49	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking	No Not Applicable No Not Applicable Yes Yes
48 a 48 a1 48 b 48 b1 49 49 a 49 b	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks	No Not Applicable No Not Applicable Yes Yes
48 a 48 a1 48 b 48 b1 49 49 a 49 b	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks	No Not Applicable No Not Applicable Yes Yes Yes
48 a 48 a1 48 b 48 b1 49 49 a 49 b	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides	No Not Applicable No Not Applicable Yes Yes
48 a 48 a1 48 b 48 b1 49 49 a 49 b 49 c 49 d 49 e	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks	No Not Applicable No Not Applicable Yes Yes Yes Yes Yes
48 a 48 a1 48 b 48 b1 49 49 a 49 b	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section	No Not Applicable No Not Applicable Yes Yes Yes
48 a 48 a1 48 b 48 b1 49 49 a 49 c 49 d 49 e	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities	No Not Applicable No Not Applicable Yes Yes Yes Yes Yes
48 a 48 a1 48 b 48 b1 49 49 a 49 b 49 c 49 d 49 e	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of	No Not Applicable No Not Applicable Yes Yes Yes Yes Yes
48 a 48 a1 48 b 48 b1 49 49 a 49 c 49 d 49 e	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges	No Not Applicable No Not Applicable Yes Yes Yes Yes Yes Yes Yes
48 a 48 a1 48 b 48 b1 49 49 a 49 c 49 d 49 e	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of	No Not Applicable No Not Applicable Yes Yes Yes Yes Yes
48 a 48 a1 48 b 48 b1 49 49 a 49 c 49 d 49 e	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	No Not Applicable No Not Applicable Yes Yes Yes Yes Yes Yes Yes
48 a 48 a1 48 b 48 b1 49 49 a 49 c 49 d 49 e	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with other entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or	No Not Applicable No Not Applicable Yes Yes Yes Yes Yes Yes Yes
48 a 48 a1 48 b 48 b1 49 49 a 49 c 49 d 49 e 49 f	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Assess the risks of relationships with domestic and	No Not Applicable No Not Applicable Yes Yes Yes Yes Yes Yes Yes
48 a 48 a1 48 b 48 b1 49 49 a 49 c 49 d 49 e 49 f	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	No Not Applicable No Not Applicable Yes Yes Yes Yes Yes Yes Yes Y

49 i		
	Define the process for escalating financial crime risk	
		Yes
		163
	employees	
49 j	Define the process, where appropriate, for terminating	
	existing customer relationships due to financial crime	Yes
	risk	
49 k	Define the process for exiting clients for financial crime	
45 K		Mar.
	reasons that applies across the entity, including foreign	res
	branches and affiliates	
49	Define the process and controls to identify and handle	
	customers that were previously exited for financial	
		Yes
	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	Yes
49 n	Outline the processes for the maintenance of internal	Yes
	"watchlists"	res
50	Has the Entity defined a risk tolerance statement or	
30		Ven
	, , , , , , , , , , , , , , , , , , , ,	Yes
	their business?	
51	Does the Entity have record retention procedures that	Yee.
	comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	
J 1 4	ii i, miat is the retention penou:	
		E voore or more
		5 years or more
52	Confirm that all responses provided in the above Section	Yee
	are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to	
32 a		
	and the branch/es that this applies to.	N/A
		N/A
53	If appropriate, provide any additional information/context	
53	If appropriate, provide any additional information/context	
53	to the answers in this section.	N/A
53	to the answers in this section.	N/A
53	to the answers in this section.	N/A
	to the answers in this section.	N/A
	to the answers in this section.	N/A
6. AML, C	to the answers in this section. TF & SANCTIONS RISK ASSESSMENT	N/A
	to the answers in this section. CTF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent	N/A
6. AML, C	to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
6. AML, C	to the answers in this section. CTF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes
6. AML, C	to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
6. AML, C 54 54 a 54 b	to the answers in this section. CTF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Yes Yes
6. AML, C 54 54 a 54 b 54 c	to the answers in this section. ETF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c	to the answers in this section. CTF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes Yes
6. AML, C 54 54 a 54 b 54 c	to the answers in this section. CTF & 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	Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c	to the answers in this section. CTF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d	to the answers in this section. CTF & 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:	Yes Yes Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a	to the answers in this section. ETF & 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	Yes Yes Yes Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b	to the answers in this section. ETF & 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	Yes Yes Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 55 a 55 b	to the answers in this section. ETF & 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	Yes Yes Yes Yes Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b	to the answers in this section. ETF & 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	Yes Yes Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 55 a 55 b	to the answers in this section. ETF & 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	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d	to the answers in this section. CTF & 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	Yes Yes Yes Yes Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 55 a 55 b 55 c 55 d	to the answers in this section. ETF & 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	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e	to the answers in this section. ETF & 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	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 c 55 d 55 c	to the answers in this section. ETF & 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	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e	to the answers in this section. ETF & 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	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 c 55 c 55 d 55 e	to the answers in this section. CTF & 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	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 c 55 d 55 c	to the answers in this section. ETF & 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	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h	to the answers in this section. ETF & 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?	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 c 55 c 55 d 55 e	to the answers in this section. ETF & 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	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h	to the answers in this section. ETF & 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?	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h	to the answers in this section. ETF & 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	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h	to the answers in this section. ETF & 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	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h	to the answers in this section. ETF & 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	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 c 55 c 55 c 55 c 55 d 55 e	to the answers in this section. ETF & 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
6. AML, C 54 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h	to the answers in this section. ETF & 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
6. AML, C 54 54 a 54 b 54 c 54 d 55 c 55 c 55 c 55 d 55 c 55 f 55 g 55 h 56 a	to the answers in this section. ETF & 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:	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 c 55 d 55 c 55 d 55 e 55 f 56 56 a	to the answers in this section. ETF & 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	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 c 55 c 55 c 55 d 55 c 55 f 55 g 55 h 56 a	to the answers in this section. ETF & 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:	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	to the answers in this section. ETF & 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	Yes
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 a 55 r 55 d 55 r 56 56 a	to the answers in this section. ETF & 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	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 f 55 g 55 h 56 57 a 57 a 57 c 57 d	to the answers in this section. ETF & 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	Yes
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 a 55 r 55 d 55 r 56 56 a	to the answers in this section. ETF & 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	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 f 55 g 55 h 56 57 a 57 a 57 c 57 d	to the answers in this section. ETF & 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	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 c 55 d 55 c 55 d 55 e 57 a 57 a 57 c 57 d 58	to the answers in this section. ETF & 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:	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	to the answers in this section. ETF & 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 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 57 a 57 a 57 a 57 d 58 58 a 58 b	to the answers in this section. ETF & 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 Governance	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	to the answers in this section. ETF & 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 Governance List Management	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 57 a 57 a 57 a 57 d 58 58 a 58 b	to the answers in this section. ETF & 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 Governance	Yes

58 e 58 f 58 g 59	Transaction Screening	Yes Yes
58 g		
	Training and Education	
59		Yes
	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA	
	was completed.	N/A
		N/A
60	Confirm that all responses provided in the above Section	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.	N/A
		TO THE STATE OF TH
61	If appropriate, provide any additional information/context	
	to the answers in this section.	lava
		N/A
7 KYC C	DD and EDD	
62		Yes
63	Do the Entity's policies and procedures set out when	
30		Yes
	or within 30 days?	
64	Which of the following does the Entity gather and retain	
T	when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b		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		Yes Yes
65 c 65 d		Yes
66	What is the Entitude minimum (levent) threehold applied	
00	to beneficial ownership identification?	20%
67	Does the due diligence process result in customers	
•	receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the	
	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	
		Distribution Channel and Transactions risk
68	For high risk non-individual customers, is a site visit a	Yes
	part of your KYC process?	
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2	KYC renewal	No
68 a3	Trigger event	Yes
68 a4	Other	
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to	
	screening customers for Adverse Media/Negative	Yes
	News?	
69 a	If Y, is this at:	
69 a1	Onboarding	Yes Yes
69 a2	KYC renewal	

00 - 0	T	Vac.
69 a3	Trigger event What is the method used by the Entity to screen for	Yes
70	Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to	
	screening customers and connected parties to	Yes
	determine whether they are PEPs, or controlled by	Tes
	PEPs?	
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes Yes
71 a3	Trigger event What is the method used by the Entity to screen PEPs?	Tes
12	What is the method used by the Linkly to screen i Li s:	Combination of automated and manual
73	Does the Entity have policies, procedures and	
	processes to review and escalate potential matches	
	from screening customers and connected parties to	Yes
	determine whether they are PEPs, or controlled by	
74	PEPs? Is KYC renewed at defined frequencies based on risk	
74	rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	No
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
		AVA
		N/A
75	Does the Entity maintain and report metrics on current	
	and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or	
	industries are subject to EDD and/or are restricted, or	
	prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Prohibited
76 b	Respondent Banks	Always subject to EDD
76 b1	If EDD or restricted, does the EDD assessment	
	contain the elements as set out in the Wolfsberg	Yes
	Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	Always subject to EDD
76 d	Extractive industries	Always subject to EDD
76 e	Gambling customers	Prohibited Always subject to EDD
76 f	General Trading Companies Marijuana-related Entities	Prohibited
76 g 76 h	MSB/MVTS customers	Always subject to EDD
76 i	Non-account customers	Prohibited
76 j	Non-Government Organisations	Always subject to EDD
76 k	Non-resident customers	EDD on risk-based approach
76 I	Nuclear power	Prohibited
76 m	Payment Service Providers	EDD on risk-based approach
76 n	PEPs	Always subject to EDD
76 o	PEP Close Associates	Always subject to EDD
76 p	PEP Related	Always subject to EDD
76 q	Precious metals and stones	Always subject to EDD
76 r	Red light businesses/Adult entertainment	Prohibited
76 s	Regulated charities	Always subject to EDD
76 t	Shell banks	Prohibited Always subject to EDD
76 u	Travel and Tour Companies Unregulated charities	Always subject to EDD Prohibited
76 v 76 w	Used Car Dealers	Always subject to EDD
76 x	Virtual Asset Service Providers	Always subject to EDD
76 y	Other (specify)	Always subject to EDD: Cash intensive businesses, Hotels, Pooled funds, Introduced Business from
,		Professional Intermediaries, Non face-to-face business, Customer dealing with 'High Risk' countries, Offshore corporations, Auctioneers, Lawyers, Notaries, Accountants and Auditors.
77	If restricted, provide details of the restriction	
11	If restricted, provide details of the restriction	
		N/A
78	Does EDD require senior business management and/or	Yes
	compliance approval?	

Does the Entity have specific procedures for combarding entities that handle client money such as layers, accountants, consultants, real estate agents? 50 Does the Entity perform an additional control or qualify. See the Entity perform an additional control or qualify. See the Entity perform an additional control or qualify. See the Entity perform the Entity perform an additional control or qualify. See the Entity perform the Entity perform the Entity perform the Entity performs t	78 a	If Y indicate who provides the approval:	Both
entities that hands client money such as lawyers, accountable, consultants, consultants, and seletial agents? 80 Does the Entity perform an additional control or quality reviews calcients sublect to EDT2/* me be become bester years and the propose properties of the separates properties and the properties of the separates properties and the practices and the branchies that his applies to and the branchies that his applies to and the branchies that his applies to the analysis of the separates properties and the branchies that his applies to the service of			500.
a coourtantes, consultants, real estate agents? Does the Entity perform an additional control or quality regime on claims subject to EDD? Todina has all responses to the analysis of the process of the control of the process of the process of the control of the process of th	, ,		Ves
80 Oces the Entity perform an additional control or quality review on clients subject to EDO? 81 Confirm that all responses provided in the above Section of an intermediation of all the ELE blanches. 81 a Provide any additional information/content to the anawers in this section. 82 If appropriate, provide any additional information/content to the anawers in this section. 83 Does the Entity have risk based policies, procedures according to the anawers in this section. 84 What is the method used by the Entity to monitor translations and formation of suspicious additional sections of translations and formations of suspicious additional sections. 84 If manual or combination selected, specify what type of translations are monitored manually asset or combination selected, specify what type of translations are monitored manually asset or combination selected, specify what type of translations are monitored manually asset or combination selected, specify what type of translations are monitored manually asset or combination selected, specify what type of translations are monitored manually asset or combination selected, specify what type of translations are monitored manually asset or combination selected, specify what type of translations are monitored translations asset or the selected, what is the name of the vendor-sourced looks used? 84 bit If vendor-sourced tool used? 84 bit If vendor-sourced tool used? 85 bit If vendor-sourced tool used? 86 conditions are combination selected, what is the name of the vendor-sourced tools used? 87 control the vendor-sourced translation and activity? 88 a If vendor sourced translations and activity? 89 control the vendor-sourced translation and activity? 80 confirm that all responses provided in the activity and activi			Tes .
review on clients subject to EDD? Confirm that all responses provided in the above Section as excessed relative of all the LES branches I all the branchies that this applies to and the branchies that this applies to and the branchies that this applies to the answers in this section. All appropriate, provide any additional information/context to the answers in this section. B. MONITORING & REPORTING Does the Entity have risk based poticies, procedures and monitoring processes for the identification and manually applies to transactions or suspicious adollies? B4 4 If automated or combination selected, specify what lybe of transactions are monitored manually applies to transactions are monitored manually. N/A B4 b If automated or combination selected, are internal system or vendor-sourced tools used? B4 b If automated or combination selected, what its the name of the vendor-sourced tools used? B4 b If automated or combination selected, what its the name of the vendor-sourced tools used? B4 b If automated or the processes in the processes in the processes of the pro			
81 Contim that all responses provided an the above Section are respectations of all bit. Ex b panches are respectations of all bit. Ex b panches and in the bit and the state of the section. 82 If appropriate, provide any additional information/context to the answers in this section. 83 Does the Entity have risk based policies, procedures and monoritoring processes for the identification and response of the identification and respo	80		Yes
are somewhaters of all the LFs branches 1 a 1, chirty which questions the difference's relate to and the branchies that this applies to NAA 22 If appropriate, provide any additional informationicontext to the answers in the section. 28 MONITORING & REPORTING 28 MONITORING & REPORTING 29 Des the Entity have risk based policies, procedures and monatoring processes for the identification and reporting of suspicious uschard. 39 What is the method used by the Entity to monitor with the section of suspicious uschard. 40 What is the method used by the Entity to monitor with the section of suspicious uschard. 41 Transactions are monitored manually what type of transactions are monitored manually system or vendor-sourced tools used? 42 If automated or combination selected, are internal system or vendor-sourced tools used? 43 If automated or combination selected, what is the name of the vendor-sourced tool reboth selected, what is the name of the vendor-sourced tool of both selected, what is the name of the vendor-sourced tool of both selected, what is the name of the vendor-sourced tool of both selected, what is the name of the vendor-sourced tool of both selected, what is the name of the vendor-sourced tool of both selected, what is the name of the vendor-sourced tool of both selected, what is the name of the vendor-sourced tool of both selected, what is the name of the vendor-sourced tool of both selected, what is the name of the vendor-sourced tool of both selected, what is the name of the vendor-sourced tool of both selected, what is the name of the vendor-sourced tool of both selected, what is the name of the vendor-sourced tools of the processes to complete the processes to source the processes to complete the processes to source the processes to complete the processes to source t	01		
### St. clarify which questions the difference's relate to and the branchies that this applies to NIA ### St.	01		Yes
and the branchies that this applies to N/A 82 If appropriate, provide any additional information/context to the answers in this section. 83 Does the Entity have risk based policies, procedures and monitoring processes for the identification and macrieria of subscicloss action. 84 85 Business of the identification and macrieria of transactions of subscicloss activities. 86 87 88 Business of the identification and macrieria of transactions of subscicloss activities. 88 89 Business of the identification and macrieria of transactions are monitored manually transactions are monitored manually vendor-sourced tools used? 89 Business of the internal of the vendor-sourced tools used? Business of the internal of the vendor-sourced tools used? 80 Business of the internal of the vendor-sourced tools used? Business of the internal of the vendor-sourced tools used? 80 Business of the internal of the vendor-sourced tools used? Business of the internal of the vendor-sourced tools used? Business of the internal of the vendor-sourced tools used? Business of the internal of the vendor-sourced tools used? Business of the internal of the vendor-sourced tools used? Business of the internal of the vendor-sourced tools used? Business of the internal of the vendor-sourced tools used? Business of the internal of the vendor-sourced tools used? Business of the internal of the vendor-sourced tools used? Business of the internal of the vendor-sourced tools used? Business of the internal of the vendor-sourced tools used? Business of the internal of the internal of the vendor-sourced tools used? Business of the internal of the inte	R1 a		
8. MONITORING & REPORTING 8. MONITORING & REPORTING 8. Open the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activities? 4. What is the method used by the Entity to monitor transactions are monitored manually of transactions are monitored manually and transactions are monitored manually assisted or an area of the vendor-sourced tools used? 4. If audiomated or combination selected, are internal system or vendor-sourced tools used? 4. If audiomated or combination selected, are internal system or vendor-sourced tools used? 4. If a vendor-sourced tools used? 4. If a vendor-sourced tools used? 4. If a vendor-sourced tools used? 5. Vendor-sourced tools 6. Vendo	0. 0		
S. MONITORING & REPORTING		and the branchies that this applies to	N/A
S. MONITORING & REPORTING			
S. MONITORING & REPORTING			
S. MONITORING & REPORTING	82	If appropriate, provide any additional information/context	
and monitoring processes for the identification and recording 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 for suspicious activities? 84 b If automated 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 b If vendor-course tools used? 84 b If vendor-course tools used? 84 b If vendor-course tools used? 85 b Vendor-sourced tools used? 86 b Vendor-sourced tools used? 86 c Vendor-sourced tools 87 c Vendor-sourced tools 88 c Vendor-sourced tools 89 c Vendor-sourced tools 89 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 81 c Vendor-sourced tools 82 c Vendor-sourced tools 83 c Vendor-sourced tools 84 b Vendor-sourced tools 85 c Vendor-sourced tools 86 c Vendor-sourced tools 87 c Vendor-sourced tools 88 c Vendor-sourced tools 89 c Vendor-sourced tools 89 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 81 c Vendor-sourced tools 82 c Vendor-sourced tools 83 c Vendor-sourced tools 84 b Vendor-sourced tools 84 b Vendor-sourced tools 85 c Vendor-sourced tools 86 c Vendor-sourced tools 87 c Vendor-sourced tools 88 c Vendor-sourced tools 89 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 81 vendor-sourced tools 82 c Vendor-sourced tools 83 c Vendor-sourced tools 84 b Vendor-sourced tools 84 b Vendor-sourced tools 85 c Vendor-sourced tools 86 c Vendor-sourced tools 87 c Vendor-sourced tools 87 c Vendor-sourced tools 88 c Vendor-sourced tools 98 c Vendor-sourced tools 99 c Vendor-sourced tools 90 c Vendor-sourced tools 90 c Vendor-sourced tools 90 c Vendor-sourced too		to the answers in this section.	76h: Regulated Exchanges only.
and monitoring processes for the identification and recording 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 for suspicious activities? 84 b If automated 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 b If vendor-course tools used? 84 b If vendor-course tools used? 84 b If vendor-course tools used? 85 b Vendor-sourced tools used? 86 b Vendor-sourced tools used? 86 c Vendor-sourced tools 87 c Vendor-sourced tools 88 c Vendor-sourced tools 89 c Vendor-sourced tools 89 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 81 c Vendor-sourced tools 82 c Vendor-sourced tools 83 c Vendor-sourced tools 84 b Vendor-sourced tools 85 c Vendor-sourced tools 86 c Vendor-sourced tools 87 c Vendor-sourced tools 88 c Vendor-sourced tools 89 c Vendor-sourced tools 89 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 81 c Vendor-sourced tools 82 c Vendor-sourced tools 83 c Vendor-sourced tools 84 b Vendor-sourced tools 84 b Vendor-sourced tools 85 c Vendor-sourced tools 86 c Vendor-sourced tools 87 c Vendor-sourced tools 88 c Vendor-sourced tools 89 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 81 vendor-sourced tools 82 c Vendor-sourced tools 83 c Vendor-sourced tools 84 b Vendor-sourced tools 84 b Vendor-sourced tools 85 c Vendor-sourced tools 86 c Vendor-sourced tools 87 c Vendor-sourced tools 87 c Vendor-sourced tools 88 c Vendor-sourced tools 98 c Vendor-sourced tools 99 c Vendor-sourced tools 90 c Vendor-sourced tools 90 c Vendor-sourced tools 90 c Vendor-sourced too			
and monitoring processes for the identification and recording 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 for suspicious activities? 84 b If automated 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 b If vendor-course tools used? 84 b If vendor-course tools used? 84 b If vendor-course tools used? 85 b Vendor-sourced tools used? 86 b Vendor-sourced tools used? 86 c Vendor-sourced tools 87 c Vendor-sourced tools 88 c Vendor-sourced tools 89 c Vendor-sourced tools 89 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 81 c Vendor-sourced tools 82 c Vendor-sourced tools 83 c Vendor-sourced tools 84 b Vendor-sourced tools 85 c Vendor-sourced tools 86 c Vendor-sourced tools 87 c Vendor-sourced tools 88 c Vendor-sourced tools 89 c Vendor-sourced tools 89 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 81 c Vendor-sourced tools 82 c Vendor-sourced tools 83 c Vendor-sourced tools 84 b Vendor-sourced tools 84 b Vendor-sourced tools 85 c Vendor-sourced tools 86 c Vendor-sourced tools 87 c Vendor-sourced tools 88 c Vendor-sourced tools 89 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 80 c Vendor-sourced tools 81 vendor-sourced tools 82 c Vendor-sourced tools 83 c Vendor-sourced tools 84 b Vendor-sourced tools 84 b Vendor-sourced tools 85 c Vendor-sourced tools 86 c Vendor-sourced tools 87 c Vendor-sourced tools 87 c Vendor-sourced tools 88 c Vendor-sourced tools 98 c Vendor-sourced tools 99 c Vendor-sourced tools 90 c Vendor-sourced tools 90 c Vendor-sourced tools 90 c Vendor-sourced too			
Bay Does the Entity have risk based polcles, procedures and montoning processes for the identification and reporting of suspicious activities? 84 What is the method used by the Entity to monitor transactions for suspicious activities? 84 a	O MONIT	FORING & DEPORTING	
and monitoring processes for the identification and reprofiting of suspicious activities? 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 bb If automated or combination selected, are internal system or vendor-sourced tool used? 84 bb If wendor-sourced tool or 96th selected, what is the name of the vendor/tool? 85 bc If when was the tool last updated? 86 bc If when was the automated Transaction Monitoring application stat calibrated? 87 selected when wendor/tool? 88 and If year departments to report suspicious transactions? 89 and If year departments to report suspicious transactions and processes to comply with suspicious transaction reporting requirements? 89 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 89 Does the Entity have processes in place to respond to Request for Information (PRIs) to more rentities in a first transactions are subted to monitoring? 80 Does the Entity have processes in place to send Request for Information (PRIs) to more rentities in a first state of the processes of			
### Proceding of suspicious activities? ### Author is the method used by the Entity to monitor transactions for suspicious activities? ### Author is the method used by the Entity to monitor transactions for suspicious activities? ### Author is the manual or combination selected, ageing what type of transactions are monitored manually ### Author is the manual or combination selected, are internal system or vanido-sourced tools used? ### If automated or combination selected, are internal system or vanido-sourced tools used? #### Author is the vanido of	63		Yas
What is the method used by the Entity to monitor transactions for suspicious activities? 84 a			163
transactions for suspicious activities? If manual or combination selected, specify what type of transactions are monitored manually N/A If automated or combination selected, are internal system or vendor-sourced tools used? If Yendor-sourced tools used? If Yendor-sourced tools used? If Yendor-sourced tools used? When was the tool last updated? It years Vendor-sourced tools used? Kiya.ai If Yendor-sourced tools used? If yendor-sourced tools used? If yendor-sourced tools used? If years years Vendor-sourced tools years Kiya.ai If years Vendor-sourced tools years Kiya.ai If years Ves Sources the Entity have polices, procedures and processes to comply with suspicious transaction reporting requirements? Obes the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Obes the Entity have policies, procedures and processes to review and secalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are used to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a new processes of the place of the place to respond to Request For Information (RFIs) from other entities in a lineary manner? October the Entity have processes in place to respond to Request for Information (RFIs) from other entities in a lineary manner? If appropriate, provide any additional information/context to the answers in this section. N/A If appropriate, provide any additional information/context to the answers in this section.	84		
If manual or combination selected, specify what type of transactions are monitored manually 84 b			Automated
transactions are monitored manually N/A 84 b	84 a		
84 b If automated or combination selected, are internal system or vendor-sourced tools used? 84 b1 If 'Vendor-sourced tools' used? 84 b2 When was the tool last updated? 84 b2 When was the automated Transaction Monitoring application last calibrated? 85 Does the Entity have regulatory requirements to report subjection to stack calibrated? 86 Does the Entity have policies, procedures and processes to rendy with suspicious transaction and activity? 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 clast 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) the other customers in a timely manner? 90 Confirm that all responses provided in the above Section are representative of all the LFs branches 90 A If N, Clarify which questions the difference's relate to and the branch'es that this applies to N/A 91 If appropriate, provide any additional information/context to the answers in this section. N/A 92 Does the Entity have to the Wolfsberg Group Payment (ves			
system or vendor-sourced tools used? If Vendor-sourced tool or 'Both' selected, what is the name of the vendor/tool? Kya.al When was the tool last updated? Source tool as tealbrated? Toes the Entity have regulatory requirements to report species to comply with suspicious transaction resorting requirements? Toes the Entity have policies, procedures and processes to comply with suspicious transaction resorting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For information (RFIs) from other entities in a timely manner? Confirm that all responses provided in the above Section are representative of all the LFS branches If N, clarity which questions the difference/s relate to and the branch/es that this applies to N/A Jean Confirm that all responses provided any additional information/context to the answers in this section. Went of the confirmation of the subject to the Wolfsberg Group Payment Vent of the vent of the wolfsberg Group Payment Vent of the process of the confirmation of the process of the process of the process of the proces			N/A
system or vendor-sourced tools used? If Vendor-sourced tool or 'Both' selected, what is the name of the vendor/tool? Kya.al When was the tool last updated? Source tool as tealbrated? Toes the Entity have regulatory requirements to report species to comply with suspicious transaction resorting requirements? Toes the Entity have policies, procedures and processes to comply with suspicious transaction resorting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For information (RFIs) from other entities in a timely manner? Confirm that all responses provided in the above Section are representative of all the LFS branches If N, clarity which questions the difference/s relate to and the branch/es that this applies to N/A Jean Confirm that all responses provided any additional information/context to the answers in this section. Went of the confirmation of the subject to the Wolfsberg Group Payment Vent of the vent of the wolfsberg Group Payment Vent of the process of the confirmation of the process of the process of the process of the proces			
system or vendor-sourced tools used? If Vendor-sourced tool or 'Both' selected, what is the name of the vendor/tool? Kya.al When was the tool last updated? Source tool as tealbrated? Toes the Entity have regulatory requirements to report species to comply with suspicious transaction resorting requirements? Toes the Entity have policies, procedures and processes to comply with suspicious transaction resorting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For information (RFIs) from other entities in a timely manner? Confirm that all responses provided in the above Section are representative of all the LFS branches If N, clarity which questions the difference/s relate to and the branch/es that this applies to N/A Jean Confirm that all responses provided any additional information/context to the answers in this section. Went of the confirmation of the subject to the Wolfsberg Group Payment Vent of the vent of the wolfsberg Group Payment Vent of the process of the confirmation of the process of the process of the process of the proces	04 h	If automated as combination calcuted, are internal	
### Bit If Vendor-sourced toof or 'Both' selected, what is the name of the vendor/tool? ### Bit When was the tool last updated? ### Bit When was the automated Transaction Monitoring angleation last calibrates? ### Bit Does the Entity have regulatory requirements to report suspicious transactions? ### Bit Does the Entity have regulatory requirements to report suspicious transactions? ### Bit When was the Entity have regulatory requirements to report suspicious transactions? ### Bit When was the automated Transactions? ### Bit Does the Entity have policies, procedures and processes to comply with suspicious transaction are processes to comply with suspicious transaction are processes to comply with suspicious transactions are processes to comply with suspicious transactions are subject to monitoring of customer transactions and activity? #### Bit Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? #### Bit Does the Entity have processes in place to send Request For Information (RFIs) from other entities in a timely manner? #### Bit Does the Entity have processes in place to send Request For Information (RFIs) from other entities in a timely manner? #### Bit Does the Entity have processes in place to send Request For Information (RFIs) for mother entities in a timely manner? #### Bit Does the Entity have processes in place to send Request For Information (RFIs) for mother entities in a timely manner? #### Bit Does the Entity have processes in place to send Request For Information (RFIs) for mother entities in a timely manner? ##### Bit Does the Entity have processes in place to send Request For Information (RFIs) for mother entities in a timely manner? ###################################	84 D		Vendor-sourced tools
name of the vendor/tool? Kiya.al When was the tool last updated? When was the automated Transaction Monitoring application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For information (RFIs) from other entities in a timely manner? Does the Entity have processes in place to send Request for information (RFIs) from other entities in a timely manner? Confirm that all responses provided in the above Section are representative of all the LEs branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to N/A J. PAYMENT TRANSPARENCY Does the Entity ahere to the Wolfsberg Group Payment Lyes Does the Entity have processes in place to send Request for information (RFIs) to their customers in a timely manner? If appropriate, provide any additional information/context to the answers in this section.	84 b1		
Kiya.al	04 51		
When was the automated Transaction Monitoring application last calibrated? 1 year		name of the vendenteer.	Kiya.ai
When was the automated Transaction Monitoring application last calibrated? 1 year			
34 b3 When was the automated Transaction Monitoring application last calibrated? 55 Does the Entity have regulatory requirements to report suspicious transactions? 56 a If Y, does the Entity have policies, procedures and processes to compty with suspicious transaction reporting requirements? 56 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 57 Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? 58 Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? 59 Does the Infity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? 50 Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to 50 If Appropriate, provide any additional information/context to the answers in this section. 51 PAYMENT TRANSPARENCY 52 Does the Entity adhere to the Wolfsberg Group Payment (Yes)			
application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction resporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? To Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have processes in place to respond to Request For Information (RFIs) to their customers in a timely manner? Does the Entity have processes in place to send Request for Information (RFIs) to their customers in a timely manner? To Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to N/A If appropriate, provide any additional information/context to the answers in this section. N/A PAYMENT TRANSPARENCY Does the Entity have processes in place to respond to Regulary to the difference of the customers in a timely manner? Yes To Request for Information (RFIs) to their customers in a timely manner? Yes To Regulary to Transparency Yes	84 b2	When was the tool last updated?	1-2 years
B5 Does the Entity have processes to comply with suspicious transactions? B6 Does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? B6 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? B7 Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? B8 Does the Entity have processes in place to respond to Request For information (RFis) from other entities in a timely manner? B9 Does the Intity have processes in place to send Requests for information (RFis) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches F1 N, clarify which questions the difference/s relate to and the branch/es that this applies to N/A 9. PAYMENT TRANSPARENCY 92 Does the Entity adhere to the Wolfsberg Group Payment ves	84 b3	When was the automated Transaction Monitoring	< 1 year
Section Sect			a ryour
If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? The programme to the complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? October 1	85		Yes
processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Toes the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFis) from other entities in a timely manner? Does the Entity have processes in place to send Requests for Information (RFis) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LF's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to N/A PAYMENT TRANSPARENCY Does the Entity adhere to the Wolfsberg Group Payment types	95.0		
reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? To Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFis) from other entities in a timely manner? Does the Entity have processes in place to send Requests for Information (RFis) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to If appropriate, provide any additional information/context to the answers in this section. N/A PAYMENT TRANSPARENCY Does the Entity adhere to the Wolfsberg Group Payment types	00 a		Voe
Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to If appropriate, provide any additional information/context to the answers in this section. Pes PAYMENT TRANSPARENCY Does the Entity adhere to the Wolfsberg Group Payment types			165
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 91 If N, clarify which questions the difference/s relate to and the branch/es that this applies to N/A 91 If appropriate, provide any additional information/context to the answers in this section. N/A 92 Does the Entity advere to the Wolfsberg Group Payment Ves	86		
the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to If appropriate, provide any additional information/context to the answers in this section. N/A PAYMENT TRANSPARENCY Does the Entity adhere to the Wolfsberg Group Payment Ves	00		Voe
B7 Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? B8 Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? B9 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 N/A 91 If appropriate, provide any additional information/context to the answers in this section. N/A 9. PAYMENT TRANSPARENCY 92 Does the Entity adhere to the Wolfsberg Group Payment Ives			
programme to ensure that complete data for all transactions are subject to monitoring? 88	07		
transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? By Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. PAYMENT TRANSPARENCY Does the Entity adhere to the Wolfsberg Group Payment Yes	07		Vac
Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the Entity adhere to the Wolfsberg Group Payment Yes Does the Entity adhere to the Wolfsberg Group Payment Yes			163
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 N/A 91 If appropriate, provide any additional information/context to the answers in this section. N/A 9. PAYMENT TRANSPARENCY 92 Does the Entity adhere to the Wolfsberg Group Payment Ves	88		
timely manner? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to If appropriate, provide any additional information/context to the answers in this section. PAYMENT TRANSPARENCY Does the Entity adhere to the Wolfsberg Group Payment Yes			Yes
Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to If appropriate, provide any additional information/context to the answers in this section. PAYMENT TRANSPARENCY Does the Entity adhere to the Wolfsberg Group Payment Yes Yes			
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 N/A 91 If appropriate, provide any additional information/context to the answers in this section. N/A 9. PAYMENT TRANSPARENCY 92 Does the Entity adhere to the Wolfsberg Group Payment Yes	89		
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 N/A 91 If appropriate, provide any additional information/context to the answers in this section. N/A 9. PAYMENT TRANSPARENCY 92 Does the Entity adhere to the Wolfsberg Group Payment Yes			Yes
90 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to N/A 91 If appropriate, provide any additional information/context to the answers in this section. N/A 9. PAYMENT TRANSPARENCY 92 Does the Entity adhere to the Wolfsberg Group Payment Yes		timely manner?	
90 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to N/A 91 If appropriate, provide any additional information/context to the answers in this section. N/A 9. PAYMENT TRANSPARENCY 92 Does the Entity adhere to the Wolfsberg Group Payment Yes	90	Confirm that all responses provided in the above Section	Yes
and the branch/es that this applies to N/A 91		are representative of all the LE's branches	
91 If appropriate, provide any additional information/context to the answers in this section. N/A 9. PAYMENT TRANSPARENCY 92 Does the Entity adhere to the Wolfsberg Group Payment Yes	90 a		
91 If appropriate, provide any additional information/context to the answers in this section. N/A 9. PAYMENT TRANSPARENCY 92 Does the Entity adhere to the Wolfsberg Group Payment Yes		and the branch/es that this applies to	N/A
to the answers in this section. N/A 9. PAYMENT TRANSPARENCY 92 Does the Entity adhere to the Wolfsberg Group Payment Yes			I VC
to the answers in this section. N/A 9. PAYMENT TRANSPARENCY 92 Does the Entity adhere to the Wolfsberg Group Payment Yes			
to the answers in this section. N/A 9. PAYMENT TRANSPARENCY 92 Does the Entity adhere to the Wolfsberg Group Payment Yes	91	If appropriate, provide any additional information/context	
9. PAYMENT TRANSPARENCY 92 Does the Entity adhere to the Wolfsberg Group Payment Yes		to the answers in this section.	
92 Does the Entity adhere to the Wolfsberg Group Payment Ves			IN/A
92 Does the Entity adhere to the Wolfsberg Group Payment Ves			
92 Does the Entity adhere to the Wolfsberg Group Payment Ves	Q DAVE	IENT TRANSPARENCY	
Transparency Standards?		Does the Entity adhere to the Wolfsherd Group Payment	
1	J.	Transparency Standards?	Yes
		The state of the s	

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to	
93 a	ensure compliance with: FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	Decree Law No. 4 of 2001, Decree Law No. 54 of 2006, Decree Law No. 25 of 2013, Decree Law No. 36 of 2017 with respect to the Prevention and Prohibition of the Laundering of Money. Central Bank of Bahrain Rulebook Volume two - Financial Crime Module.
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	Yes
06 -	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.	N/A
97	If appropriate, provide any additional information/context to the answers in this section.	N/A
10. SANC	CTIONS	
98	Does the Entity have a Sanctions Policy approved by	
35	management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against	Yes
102	Sanctions Lists? What is the method used by the Entity for sanctions	Both Automated and Manual
102 a	screening? If 'automated' or 'both automated and manual'	
100 - 1	selected:	
102 a1 102 a1a	Are internal system of vendor-sourced tools used? If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Vendor-sourced tools - Swift - Transaction Screening System - Refinitiv - World-Check One - Kiya.ai - UNIVIUS
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Automated
105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its	
106 a	sanctions screening processes: Consolidated United Nations Security Council	Used for screening customers and beneficial owners and for filtering transactional data
106 b	Sanctions List (UN) United States Department of the Treasury's Office of	Used for screening customers and beneficial owners and for filtering transactional data
	Foreign Assets Control (OFAC)	Osed for screening customers and periodical owners and for intering transactional data

106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Not used
106 f	Other (specify)	Used for screening customers and beneficial owners and for filtering transactional data: Kingdom of Bahrain - Bahrain List of Terrorist Individuals and Organizations
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	Not Applicable
112 f	Non-employed workers (contractors/consultants)	Not Applicable
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
	1	
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 114 a		Yes Annually

115 a	If N, clarify which guestions the difference/s relate to	
	and the branch/es that this applies to.	N/A
		N/A
116	If appropriate, provide any additional information/context to the answers in this section.	
	to the answers in this section.	N/A
12. QUALI	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality	
	Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based	
	Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	N/A
		IN/A
400	M	
120	If appropriate, provide any additional information/context to the answers in this section.	
	to the answers in this section.	N/A
13. AUDIT		
121	In addition to inspections by the government	
	supervisors/regulators, does the Entity have an internal	
	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC,	Yes
	Fraud and Sanctions policies and practices on a regular	
	basis?	
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	18 months
122 b	External Third Party	Yearly
123	Does the internal audit function or other independent	
123 a	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and	
120 4	procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c 123 d	Governance KYC/CDD/EDD and underlying methodologies	Yes Yes
123 d	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h 123 i	Technology Transaction Monitoring	Yes Yes
123 j	Transaction Morntoning Transaction Screening including for sanctions	Yes
123 k		
	Training & Education	Yes
123 I		
	Training & Education	Yes
	Training & Education	
123	Training & Education Other (specify)	Yes
	Training & Education Other (specify) Are adverse findings from internal & external audit	Yes
123	Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes N/A
123	Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section	Yes N/A
123	Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes N/A Yes
123	Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches	Yes N/A Yes Yes
123	Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to	Yes N/A Yes
123 I 124 125 125 a	Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Yes N/A Yes N/A N/A
123	Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Yes N/A Yes N/A N/A
123 I 124 125 125 a	Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Yes N/A Yes N/A N/A
123 I 124 125 125 a	Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Yes N/A Yes N/A N/A
123 I 124 125 125 a	Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Yes N/A Yes N/A N/A
123 I 124 125 125 a	Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Yes N/A Yes Yes N/A
123 I 124 125 125 a 126 14. FRAI	Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Yes N/A Yes N/A N/A
123 I 124 125 125 a 126	Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Yes N/A Yes Yes N/A

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?	
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 AL SALAM BANK B.S.C 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

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.

Hussein Abdulhaq A-007

(Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided n 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.

Ali Al Khaja (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I m authorised to execute this declaration on behalf of the Financial Institution

(Signature & Date)

(Signature & Date)

23, Nov. 2025

li Yousif Al Khaja



