## Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ) V1.4

the Wolfsberg Group

Financial Institution Name: Location (Country) : City National Bank United States of America (USA)

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No #	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	
		City National Bank an RBC Company
2	Append a list of foreign branches which are covered	
	by this questionnaire	Not applicable (N/A)
3	Full Legal (Registered) Address	555 South Flower Street Los Angeles, CA 90071
		bis bouilt hower birect Los Angeles, bA 5007 h
4	Euli Deimanna Darainana Addesa /if different from	
4	Full Primary Business Address (if different from	N/A
	above)	
5	Date of Entity incorporation/establishment	
-		04 December 1953
6	Select type of ownership and append an ownership	
	chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker	
o u i	symbol	N/a
	Symbol	
6 b	Member Owned/Mutual	No
6 C	Government or State Owned by 25% or more	No
6 d	Privately Owned	Yes
6 d1		
6 0 1	If Y, provide details of shareholders or ultimate	1000/ auroad by DDC UCA HoldCo Corporation
	beneficial owners with a holding of 10% or more	100% owned by RBC USA HoldCo Corporation
7	% of the Entity's total shares composed of bearer	
	shares	0%
		070
8	Does the Entity, or any of its branches, operate under	AL.
	an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es	
	which operate under an OBL	
	······································	
9	Does the Bank have a Virtual Bank License or	Ne
	provide services only through online channels?	No
10	Name of primary financial regulator/supervisory	
	authority	Office of the Comptroller of the Currency (OCC)
11	Provide Legal Entity Identifier (LEI) if available	593C3GZG957YOJPS2Z63
40	Drovide the full legal name of the ultimate many of the	
12	Provide the full legal name of the ultimate parent (if	Royal Bank of Canada
	different from the Entity completing the DDQ)	

13		
	Jurisdiction of licensing authority and regulator of	Canada / The Office of the Superintendent of Financial Institutions (OSFI)
1	ultimate parent	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b	Private Banking	Yes
14 c	Commercial Banking	Yes
14 c	Transactional Banking	
		Yes
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	Yes
14 i	Multilateral Development Bank	No
14 j	Wealth Management	Yes
14 k	Other (please explain)	
14 K		
15	Does the Entity have a significant (10% or more)	
1.2	portfolio of non-resident customers or does it derive	
	more than 10% of its revenue from non-resident	
	customers? (Non-resident means customers primarily	No
	resident in a different jurisdiction to the location	····
	where bank services are provided)	
	where bank services are provided)	
15 a	If Y, provide the top five countries where the non-	
	resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	5001-10000
16 b	Total Assets	Greater than \$500 million
		Greater than \$500 million
17	Confirm that all responses provided in the above	Yes
	Section are representative of all the LE's branches.	103
17 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
10	14 · · · · · · · · · · · · · · · · · · ·	
18	If appropriate, provide any additional	
18	If appropriate, provide any additional information/context to the answers in this section.	
18		
18		
	information/context to the answers in this section.	
2. PRODU	information/context to the answers in this section.	
	INFORMATION INFORMATICA INFORMATION INFORMATICA INFORM	
2. PRODU	information/context to the answers in this section.	
2. PRODU	INFORMATION INFORMATICA INFORMATICA INFORMATICA INFORMATICA INFORMATICA INFORMATIC	Yes
2. PRODU 19 19 a	Information/context to the answers in this section. ICTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking	Yes
2. PRODU 19 19 a 19 a	Information/context to the answers in this section.	Yes
2. PRODU 19 19 a	Information/context 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	Yes
2. PRODU 19 19 a 19 a1 19 a1	Information/context to the answers in this section.  ICTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?	
2. PRODU 19 19 a 19 a	information/context 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 a1 19 a1	Information/context to the answers in this section.  ICTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?	
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2. PRODU 19 19 a 19 a1 19 a1a 19 a1a 19 a1b	information/context to the answers in this section.  ICTS & 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	Yes No
2. PRODU 19 19 a 19 a1 19 a1a 19 a1a 19 a1b	Information/context to the answers in this section. ICTS & 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
2. PRODU 19 19 a 19 a1 19 a1a 19 a1a 19 a1b 19 a1c	Information/context to the answers in this section. ICTS & 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 No
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2. PRODU 19 19 a1 19 a1 19 a1a 19 a1b 19 a1b 19 a1c 19 a1d	Information/context to the answers in this section. ICTS & 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?	Yes Yes
2. PRODU 19 19 a1 19 a1 19 a1a 19 a1b 19 a1b 19 a1c 19 a1d 19 a1e	Information/context to the answers in this section. ICTS & 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?	Yes No Yes Yes
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2. PRODU 19 19 a1 19 a1 19 a1a 19 a1b 19 a1b 19 a1c 19 a1c 19 a1d 19 a1f	Information/context to the answers in this section. ICTS & 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?	Yes Yes Yes No Yes No
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2. PRODU 19 19 a 19 a1 19 a1a 19 a1b 19 a1b 19 a1c 19 a1c 19 a1c 19 a1d 19 a1f	Information/context to the answers in this section. ICTS & 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 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? 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	Yes No Yes No Yes Yes No Yes
2. PRODU 19 19 a1 19 a1 19 a1a 19 a1b 19 a1b 19 a1c 19 a1c 19 a1d 19 a1f	Information/context to the answers in this section. ICTS & 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 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? 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	Yes No Yes No No
2. PRODU 19 19 a1 19 a1 19 a1 19 a1 19 a1b 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f 19 a1g	Information/context to the answers in this section. ICTS & 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 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)?	Yes No Yes No Yes Yes No Yes
2. PRODU 19 19 a1 19 a1 19 a1a 19 a1b 19 a1b 19 a1c 19 a1c 19 a1d 19 a1f	Information/context to the answers in this section. ICTS & 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 offer Correspondent Banking services 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? Does the Entity 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	Yes No Yes No Yes Yes No Yes
2. PRODU 19 19 a1 19 a1 19 a1 19 a1 19 a1b 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f 19 a1g	Information/context to the answers in this section. ICTS & 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 offer Correspondent Banking services to foreign 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? Does the Entity allow downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services 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 No Yes No Yes Yes No Yes
2. PRODU 19 19 a1 19 a1 19 a1 19 a1 19 a1b 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f 19 a1g	Information/context to the answers in this section. ICTS & 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 offer Correspondent Banking services 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? Does the Entity 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	Yes No Yes No Yes Yes No Yes
2. PRODU 19 19 a1 19 a1 19 a1 19 a1 19 a1b 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f 19 a1g	Information/context to the answers in this section. ICTS & 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 offer Correspondent Banking services to foreign 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? Does the Entity allow downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services 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 No Yes No Yes Yes No Yes
2. PRODU 19 19 a1 19 a1 19 a1a 19 a1b 19 a1b 19 a1c 19 a1d 19 a1f 19 a1f 19 a1f 19 a1f	Information/context to the answers in this section. ICTS & 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 offer Correspondent Banking services 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? Does the Entity 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 No Yes Yes No Yes No
2. PRODU 19 19 a1 19 a1 19 a1a 19 a1b 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f 19 a1f 19 a1f 19 a1h	Information/context to the answers in this section. ICTS & 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 offer Correspondent Banking services to foreign 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? Does the Entity allow downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services 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)? MSBs	Yes No Yes No Yes No

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with	Yes
	MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	Yes
19 e 19 f	Hold Mail	Yes
-	International Cash Letter Low Price Securities	No
19 g 19 h	Payable Through Accounts	No
19 ii 19 i	Payment services to non-bank entities who may	No
191	then offer third party payment services to their customers?	No
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	Please select
19 i3	Virtual Asset Service Providers (VASPs)	Please select
19 i4	eCommerce Platforms	Please select
19 i5	Other - Please explain	
19 j	Private Banking	Domestic
19 k	Remote Deposit Capture (RDC)	Yes
19 I	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:	
19 p1	Check cashing service	Yes
19 p1a	If yes, state the applicable level of due diligence	Due diligence
19 p2	Wire transfers	Yes
19 p2a 19 p3	If yes, state the applicable level of due diligence Foreign currency conversion	Due diligence Yes
19 p3 19 p3a	If yes, state the applicable level of due diligence	Due diligence
19 p3a	Sale of Monetary Instruments	Yes
19 p4a	If yes, state the applicable level of due diligence	Due diligence
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	No
19 q	Other high-risk products and services identified by the Entity (please specify)	No
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	
3. AML, C	TF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	Yes
22 b	Adverse Information Screening	Yes
22 c	Beneficial Ownership	Yes
22 d	Cash Reporting	Yes
22 e	CDD	Yes
22 f	EDD	Yes
22 g	Independent Testing	Yes
22 h	Periodic Review	Yes
22 i	Policies and Procedures	Yes
22 j 22 k	PEP Screening	Yes
22 k	Risk Assessment	Yes
22	Sanctions	Yes

22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's	
	AML, CTF & Sanctions Compliance Department?	101-500
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior	
	Management Committee? If N, describe your practice	Yes
	in Question 29.	
25	Does the Board receive, assess, and challenge	
	regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any	N.
	components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above	
20	Section are representative of all the LE's branches	Yes
29.0		
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	and the branchives that this applies to.	
29	If appropriate, provide any additional	
	information/context to the answers in this section.	
4. ANTI E	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and	
	requirements to reasonably prevent, detect and	Yes
	report bribery and corruption?	
31	Does the Entity have an enterprise wide programme	
	that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or	
52	officers with sufficient experience/expertise	No.
	responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate	
35	levels of experience/expertise to implement the ABC	No.
	programme?	Yes
24		
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This	
	includes promising, offering, giving, solicitation or	
	receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain	Yes
	an advantage.	
35 b	Includes enhanced requirements regarding	Van
	interaction with public officials?	Yes
35 c	Includes a prohibition against the falsification of	
	books and records (this may be within the ABC policy	Yes
	or any other policy applicable to the Legal Entity)?	
36	Does the Entity have controls in place to monitor the	
	effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular	
	reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment	
	(EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was	
	completed.	
39	Does the Entity have an ABC residual risk rating that	
33	TRADA US LINU HAVE AN ADD TESTINAL USK FAITIN INST	
	is the net result of the controls effectiveness and the	Yes
40	is the net result of the controls effectiveness and the inherent risk assessment?	Yes
40	is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk	Yes Yes
	is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
40 40 a	is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk	

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities	
	subject to ABC risk have been outsourced Non-employed workers as appropriate	Yes
42 f	(contractors/consultants)	Yes
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
5 AMI CI	TE & SANCTIONS POLICIES & PROCEDURES	
5. AML, CT 46	FF & SANCTIONS POLICIES & PROCEDURES Has the Entity documented policies and procedures	
	FF & SANCTIONS POLICIES & PROCEDURES Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	Ves
46 46 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering	Yes Vec
46 46 a 46 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing	Yes
46 46 a 46 b 46 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations	
46 a 46 a 46 b 46 c 47	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually?	Yes
46 46 a 46 b 46 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against:	Yes Yes
46 a 46 b 46 c 47 48 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards	Yes Yes
46 a 46 b 46 c 47 48	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against:	Yes Yes
46 a 46 b 46 c 47 48 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards	Yes Yes Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? 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?	Yes Yes Yes Yes Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? 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	Yes Yes Yes Yes No
46 a 46 b 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 48 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? 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?	Yes Yes Yes Yes No
46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 a 48 b 48 b 48 b 49	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? 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	Yes Yes Yes Yes Yes No Please select
46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 48 b 48 b 49 49 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? 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	Yes Yes Yes Yes Yes No Please select Yes
46 a 46 b 46 c 47 47 48 a 48 a 48 a 48 a 48 a 49 a 49 a 49 b 49 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? 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	Yes Yes Yes Yes Yes No Please select Yes Yes Yes
46 a 46 b 46 c 47 47 48 a 48 a 48 a 48 a 48 a 49 49 a 49 b 49 c 49 d	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? 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	Yes Yes Yes Yes Yes No Please select Yes Yes
46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 a 49 a 49 b 49 c 49 c 49 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? 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	Yes Yes Yes Yes Yes No Please select Yes Yes Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 49 a 49 a 49 b 49 c 49 c 49 f 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? 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 dealing with another entity that provides services to shell banks	Yes Yes Yes Yes Yes No Please select Yes Yes Yes
46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 a 49 a 49 b 49 c 49 c 49 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? 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	Yes Yes Yes Yes Yes No Please select Yes Yes Yes Yes

49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
49	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	5 years or more
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context to the answers in this section.	
6. AML, CTF	& SANCTIONS RISK ASSESSMENT	
6. AML, CTF	& SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 54 a	Does the Entity's AML & CTF EWRA cover the	Yes
54 54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Yes
54 54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Yes
54 a 54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
54 54 a 54 b 54 c 54 d 55	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
54 a 54 b 54 c 54 d 55 55 a	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
54 a 54 b 54 c 54 d 55 c 55 a 55 a	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
54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 b 55 c	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
54 a 54 b 54 c 54 d 55 c 55 a 55 a	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
54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 c	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
54           54 a           54 b           54 c           54 d           55 a           55 b           55 c           55 d           55 e	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 Yes Yes Yes Yes Yes Yes Yes
54           54 a           54 b           54 c           54 d           55 a           55 b           55 c           55 f	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 Yes Yes Yes Yes Yes Yes Yes
54           54 a           54 b           54 c           54 d           55 a           55 b           55 c           55 d           55 d           55 c           55 d           55 f           55 g           55 h           56	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 Yes Yes Yes Yes Yes Yes Yes Yes Yes
54           54 a           54 b           54 c           54 d           55 a           55 b           55 c           55 d           55 c           55 d           55 c           55 d           55 f           55 g           55 h	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	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54         54 a         54 b         54 c         54 d         55 a         55 b         55 c         55 d         55 f         55 f         55 f         55 f         56 a         57	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 Iast 12 months? If N, provide the date when the Iast AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
54         54 a         54 b         54 c         54 d         55 a         55 b         55 c         55 d         55 f         55 f         55 f         55 f         56         56         57         57 a	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 Iast 12 months? If N, provide the date when the Iast AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
54           54 a           54 b           54 c           54 d           55 a           55 b           55 c           55 d           55 c           55 d           55 f           55 g           55 h           56           56           57           57 a           57 b	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         Y
54           54 a           54 b           54 c           54 c           54 d           55 a           55 b           55 c           55 c           55 d           55 c           55 d           55 f           55 g           56           56           57           57 a           57 b           57 c	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
54           54 a           54 b           54 c           54 c           55 d           55 a           55 b           55 c           55 d           55 c           55 d           55 f           55 g           55 h           56           57           57 a           57 c           57 d	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         Y
54           54 a           54 b           54 c           54 d           55 a           55 b           55 c           55 d           55 d           55 d           55 f           55 g           55 h           56           57           57 a           57 c           57 d           58	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         Y
54           54 a           54 b           54 c           54 c           55 a           55 b           55 c           55 c           55 d           55 c           55 d           55 c           55 d           55 f           55 f           55 h           56 a           57 a           57 b           57 c           57 d           58 a	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
54           54 a           54 b           54 c           54 d           55 a           55 b           55 c           55 d           55 d           55 d           55 f           55 g           55 h           56           57           57 a           57 c           57 d           58	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         Y

58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
50 -		
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context to the answers in this section.	
7. KYC, C	DD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	
		Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d 66	Other relevant parties What is the Entity's minimum (lowest) threshold	Yes 10%
67	applied to beneficial ownership identification? Does the due diligence process result in customers	Yes
67 a	receiving a risk classification? If Y, what factors/criteria are used to determine the	
	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	No
68 a	If Y, is this at:	
68 a1	Onboarding	Please select
68 a2	KYC renewal	Please select
68 a3	Trigger event	Please select
68 a4	Other	Please select
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

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

78 a	If Y indicate who provides the approval:	Compliance
70 u 79	Does the Entity have specific procedures for	Compliance
19	onboarding entities that handle client money such as	
	lawyers, accountants, consultants, real estate agents?	No
	-	
80	Does the Entity perform an additional control or	Yes
	quality review on clients subject to EDD?	
81	Confirm that all responses provided in the above	No.
	Section are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
82	If appropriate, provide any additional	
	information/context to the answers in this section.	
	RING & REPORTING	
a. WONTO	KING & REFORTING	
83	Does the Entity have risk based policies, procedures	
	and monitoring processes for the identification and	Yes
	reporting of suspicious activity?	
84	What is the method used by the Entity to monitor	Automated
	transactions for suspicious activities?	Automated
	If many and the second in the second s	
84 a	If manual or combination selected, specify what	
	type of transactions are monitored manually	
	If automated or combination selected, are internal	
84 b	system or vendor-sourced tools used?	Both
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is	Nice Actimize
	the name of the vendor/tool?	
84 b2	When was the tool last updated?	< 1 year
04 02	When was the too hast updated :	< i year
84 b3	When was the automated Transaction Monitoring	
04 00	application last calibrated?	1-2 years
85	Does the Entity have regulatory requirements to	Yes
	report suspicious transactions?	165
85 a	If Y, does the Entity have policies, procedures and	
	processes to comply with suspicious transaction	Yes
	reporting requirements?	
86	Does the Entity have policies, procedures and	
	processes to review and escalate matters arising from	Yes
	the monitoring of customer transactions and activity?	
87	Does the Entity have a data quality management	
	programme to ensure that complete data for all	Yes
	transactions are subject to monitoring?	
	Does the Entity have processes in place to respond	
88		
	to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send	
	Requests for Information (RFIs) to their customers in	Yes
	a timely manner?	
90	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
	and the pranonyos that this applies to	
91	If appropriate, provide any additional	
	information/context to the answers in this section.	
	IT TRANSPARENCY	
	Does the Entity adhere to the Wolfsberg Group	
52	Payment Transparency Standards?	Yes
1	aymont fransparency stanuarus:	

	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	-	
	Local Regulations	Yes
93 b1	If Y, specify the regulation	31 CFR 1010.410
93 c	lf N, explain	
	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
	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
	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	If appropriate, provide any additional information/context to the answers in this section.	
10. SANCT	IONS	
98	Does the Entity have a Sanctions Policy approved by	
	management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
	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
	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
	Does the Entity screen its customers, including	
	beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	Entity, during onboarding and regularly thereafter	Yes Automated
102	Entity, during onboarding and regularly thereafter against Sanctions Lists? What is the method used by the Entity for sanctions	
102	Entity, during onboarding and regularly thereafter against Sanctions Lists? What is the method used by the Entity for sanctions screening? If 'automated' or 'both automated and manual' selected:	
102 102 a	Entity, during onboarding and regularly thereafter against Sanctions Lists? What is the method used by the Entity for sanctions screening? If 'automated' or 'both automated and manual'	Automated
102 102 a 102 a1 102 a1a 102 a2	Entity, during onboarding and regularly thereafter against Sanctions Lists? What is the method used by the Entity for sanctions screening? If 'automated' or 'both automated and manual' selected: Are internal system of vendor-sourced tools used? If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? 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)	Automated Both
102 a 102 a1 102 a1 102 a1a 102 a2	Entity, during onboarding and regularly thereafter against Sanctions Lists? What is the method used by the Entity for sanctions screening? If 'automated' or 'both automated and manual' selected: Are internal system of vendor-sourced tools used? If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? 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	Automated Both varies

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	
11 TRAININ		
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
112 f	Non-employed workers (contractors/consultants)	Yes
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above	Yes
	Section are representative of all the LE's branches	

115 a       In A dately which questions the advances reade to an experiment of the supplies to the specific of the spe			
116     If approprises, provide any additional information/control to the answers in this section.       12. OUALTY ASSURANCE (COMPLIANCE TESTING 17. Does the Enfly tower a program wile risk band Caulty Assurance programme for financial oring (separate for the inforphytem appropriate for the band independent Audit function?     Yee       18. Does the Enfly tower a program wile risk band Caulty Assurance programme for the above section are expressed tool of the above and the branchise shall this applies is.     Yee       19. If N cardy which musicions the difference's relies to and the branchise shall this applies is.     Yee       19. If appropriate programme in this section.     Yee       19. If appropriate programme in the first programme in the section.     Yee       19. If appropriate programme is the first programme in the section.     Yee       19. If appropriate programme is the first programme in the section.     Yee       19. If appropriate programme is the first programe is the first programme is the first programme is the first prog	115 a	If N, clarify which questions the difference/s relate to	
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117     Does the Entity have a program wide risk based (deparate from the independent Audit function)?     Yes       118     Does the Entity have a program wide risk based Complance Testing process (separate from the independent Audit function)?     Yes       119     Confirm Test all responses provided in the above Sector are trapesentiated of all the LE based and the brancives that this applies to informational control and the process (separate from the independent Audit function)?     Yes       120     If Appropriate, provide any additional information/context to the answers in this sector.     Yes       120     If appropriate, provide any addition of information/context to the answers in this sector.     Yes       121     If addition to programs by the followary incomparate the Testing brackers the Sector based of the Sector basector based of the Sector based of the Sector based of th			
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13. AUDIT     In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third participation or other independent third participation or other independent third participation as the Entity audited on 16 AML, CTF, ABC, Fraud and Sanctions projectment to the Internal Audit Department to the Internal Audit Department to the Internal Audit Department to the Internal Audit Extended Third Party     Yes       122     How often is the Entity audited on 16 AML, CTF, ABC, Fraud and Sanctions programme by the following:     Yes       123     Internal Audit Department to the Independent to the Applicable     Yes       123     Does the internal audit function or other independent to the Applicable     Yes       123     AML, CTF, ABC, Fraud and Sanctions policy and proceedings and proceedings and approxement to Holdwing areas     Yes       123     Governance     Yes     Yes       123     Governance     Yes       123     Name Screening & List Management     Yes       123     Suspicious Activity Filing     Yes       123     Transaction Monitoring     Yes       123     Transaction Monitoring     Yes       123     Are adverse findings from internal & external audit furcison     Yes       123     Transaction Monitoring     Yes       124     Are adverse findings from internal & external audit furcison     Yes       125     Confirm that all responses	120		
121       In addition to inspections by the government internal audit function, a testing function or other independent third party, or oth, that assesses FCC AdL, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?       Yes         122       How offen is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:       Yes         123       Internal Audit Department       Yearly         124       Internal Audit Department       Yearly         125       External Third Party       Not Applicable         126       External Third Party       Yearly         127       Does the internal audit function or other independent third party cover the following areas:       Yea         128       Enterprise Wide Risk Assessment       Yea         129       Enterprise Wide Risk Assessment       Yea         129       Governance       Yea         121       Transaction Screening A List Management       Yea         123       Reporting/Metrics & Management       Yea         123       Transaction Screening Inducting for sanctions       Yea         123       Transaction Screening Inducting for sanctions       Yea         123       Transaction Screening Inducting for sanctions       Yea         123       Transaction Screening Inducting for adequocy and compietenses?       Yea			
121       In addition to inspections by the government internal audit function, a testing function or other independent third party, or oth, that assesses FCC AML, CTF, ABC, 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:         123       How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:         124       How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions or other independent third party cover the following areas:         123       Dees the internal Audit Department       Yearly         123       Dees the first and a Sanctions policy and procedures       Yea         123 a       AML, CTF, ABC, Fraud and Sanctions policy and procedures       Yea         123 b       Enterprise Wide Risk Assessment       Yea         123 c       Governance       Yea         123 d       KYC/CDD/EDD and underlying methodologies       Yea         123 d       KYC/CDD/EDD and underlying methodologies       Yea         123 f       Reporting/Metrics & Management       Yea         123 g       Supcionus Activity Filing       Yea         123 f       Transaction Screening including for sanctions       Yea         123 h       Transaction Screening including for adequocy and completeness?       Yea			
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supervisoring/adjustors, does the Entity have an internal audit function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?       Yes         122       How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:       Yeanly         123 b       Internal Audit Department       Yeanly         124 b       External Third Party       Net Applicable         125 b       External Third Party       Net Applicable         123 a       AML, CTF, ABC, Fraud and Sanctions policy and procedures       Yeanly         123 b       Enterprise Wide Risk Assessment       Yes         123 c       Governance       Yes         123 d       KYC/CDD/EDD and underlying methodologies       Yes         123 d       Suspicious Activity Filing       Yes         123 d       Suspicious Activity Filing       Yes         123 f       Reporting/Metrics & Management Information       Yes         123 f       Transaction Monitoring       Yes         123 h       Training & Education       Yes         124 Are adverse		In addition to improciant by the accurate	
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independent third party, or both, that assesses FCC APR of the additional practices on a regular basis?       Yes         122       How often is the Entity audited on its AML, CTF, ABC, Frada and Sanctions programme by the following:       Yearly         123       Internal Audit Department       Yearly         124       Internal Audit Department       Yearly         125       Desc the internal audit function or other independent third party cover the following areas:       Yes         123       Desc the internal audit function or other independent third party cover the following areas:       Yes         123 to Enterprise Wide Risk Assessment       Yes       Yes         124       ARL, CTF, ABC, Fraud and Sanctions policy and procedures       Yes         123 to Enterprise Wide Risk Assessment       Yes       Yes         123 to Covernance       Yes       Yes         123 to Tarsaction Streaming including or sanctions       Yes       Yes         123 to Tarsaction Streaming including for sanctions       Yes       Yes         123 to Tarsaction Streaming including for sanctions       Yes       Yes         123 to Tarsaction Streaming including for sanctions       Yes       Yes         123 to Tarsaction Streaming including for sanctions       Yes       Yes         123 to Tarsaction Streaming including for sanchons       Yes       Yes<			
practices on a regular basis?       122     Fraud and Sanctons programme by the following:       123 a     Internal Audit Department     Yearly       124 b     External Third Party     Not Applicable       125 D     Does the internal audit function or other independent third party cover the following areas:     Not Applicable       123 a     AML, CTF, ABC, Fraud and Sanctions policy and procedures     Yes       123 b     Enterprise Wide Risk Assessment     Yes       123 c     Governance     Yes       123 d     KYCCDD/EDD and underlying methodologies     Yes       123 f     Reporting/Metrics & Management Information     Yes       123 h     Technology     Yes       123 h     Technology     Yes       123 h     Transaction Kontivity Filling     Yes       123 h     Transaction Monitoring     Yes       123 h     Transaction Screening including for sanctons     Yes       123 h     Transaction Screening including for sanctons     Yes       123 h     Other (specify)     Yes       123 h     Other (specify)     Yes       124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?     Yes       125 a     If N, clarify which questions the difference/a relate to and the branches that this applies to.     Yes <td></td> <td></td> <td>Yes</td>			Yes
122       How often is the Entity audited on its AML_CTF, ABC, Fraud and Sanctions programme by the following:         122 a       Internal Audit Department       Yearly         122 b       External Third Party       Not Applicable         123 d       Does the Entity audit duction or other independent third party cover the following areas:       Yearly         123 a       AML_CTF, ABC, Fraud and Sanctions policy and procedures       Yes         123 b       Enterprise Wide Risk Assessment       Yes         123 c       Governance       Yes         123 d       KYC/CDD/EDD and underlying methodologies       Yes         123 d       Reporting/Metrics & Management Information       Yes         123 f       Reporting/Metrics & Management Information       Yes         123 g       Suspicious Activity Filing       Yes         123 j       Transaction Monitoring       Yes         123 i       Transaction Monitoring       Yes         124 Are adverse findings from inter			
Fraud and Sanctions programme by the following:       122 a     Internal Audit Department     Yearly       123 b     External Third Party     Not Applicable       123 a     AML, CTF, ABC, Fraud and Sanctions policy and procedures     Yes       123 b     Enterprise Wide Risk Assessment     Yes       123 c     Governance     Yes       123 d     KYC/CDD/EDD and underlying methodologies     Yes       123 d     KYC/CDD/EDD and underlying methodologies     Yes       123 f     Reporting/Metrics & Management     Yes       123 g     Suspicious Activity Filing     Yes       123 h     Transaction Sciencening in Unding for sanctions     Yes       123 h     Transaction Monitoring     Yes       123 h     Transaction Monitoring     Yes       123 h     Transaction Monitoring     Yes       123 h     Transaction Sciencening in Luding for sanctions     Yes       123 h     Transaction Sciencening in Luding for sanctions     Yes       123 h     Transaction Sciencening in Luding for sanctions     Yes       123 h     Transaction Sciencening in Luding for sanctions     Yes       124 h     Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completences?     Yes       125 confirm that all responses provided in the above section are represen		practices on a regular basis?	
Fraud and Sanctions programme by the following:       122 a     Internal Audit Department     Yearly       123 b     External Third Party     Not Applicable       123 a     Does the internal audit function or other independent third party cover the following areas:     Yes       123 a     AML, CTF, ABC, Fraud and Sanctions policy and procedures     Yes       123 b     Enterprise Wide Risk Assessment     Yes       123 c     Governance     Yes       123 d     KYC/CDD/EDD and underlying methodologies     Yes       123 e     Name Screening & List Management     Yes       123 f     Reporting/Metrics & Management Information     Yes       123 f     Reporting/Metrics & Management Information     Yes       123 h     Transaction Screening including for sanctions     Yes       123 i     Transaction Monitoring     Yes       123 i     Transaction Screening including for sanctions     Yes       123 i     Transaction Screening including for sanctions     Yes       124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completences?     Yes       125 a     If N, clarify which questions the difference/s relate to and the branch/es that this applies to.     Yes       125 a     If appropriate, provide any additional information/context to the answers in this section.     Yes <td< td=""><td>122</td><td>How often is the Entity audited on its AML, CTF, ABC,</td><td></td></td<>	122	How often is the Entity audited on its AML, CTF, ABC,	
122 b     External Third Party     Not Applicable       123 correct the following areas:     Not Applicable       123 a     AML, CTF, ABC, Fraud and Sanctions policy and procedures     Yes       123 b     Enterprise Wide Risk Assessment     Yes       123 c     Governance     Yes       123 d     KYC/CDD/EDD and underlying methodologies     Yes       123 d     KYC/CDD/EDD and underlying methodologies     Yes       123 d     Suspicious Activity Filing     Yes       123 f     Reporting/Metrics & Management     Yes       123 g     Suspicious Activity Filing     Yes       123 h     Technology     Yes       123 h     Technology     Yes       123 t     Transaction Monitoring     Yes       123 t     Transaction Screening including for sanctions     Yes       123 t     Transaction Monitoring     Yes       123 t     Other (specify)     Yes       124     Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?     Yes       125 a     if N, clarify which questions the difference/s relate to and the branchies the dif		Fraud and Sanctions programme by the following:	
122 b     External Third Party     Not Applicable       123     Does the internal audit function or other independent third party cover the following areas:     Yes       123 a     AML, CTF, AEC, Fraud and Sanctions policy and procedures     Yes       123 b     Enterprise Wide Risk Assessment     Yes       123 c     Governance     Yes       123 d     KYC/CDD/EDD and underlying methodologies     Yes       123 e     Name Screening & List Management     Yes       123 g     Suspicious Activity Filing     Yes       123 h     Technology     Yes       123 h     Technology     Yes       123 i     Transaction Monitoring     Yes       123 i     Transaction Screening including for sanctions     Yes       123 i     Other (specify)     Yes       123 i     Other (specify)     Yes       123 i     Other (specify)     Yes       124     Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?     Yes       125 a     if N, clarify which questions the difference/s relate to and the LE's branches     Yes       125 a     if Appropriate, provide any additional information/context to the answers in this section.     Yes       126     If appropriate, provide any additional information/context to the answers in this section.     Yes <td>122 a</td> <td>Internal Audit Department</td> <td>Yearly</td>	122 a	Internal Audit Department	Yearly
third party cover the following areas:     Yes       123 a     AML, CTF, ABC, Fraud and Sanctions policy and procedures     Yes       123 b     Enterprise Wide Risk Assessment     Yes       123 c     Governance     Yes       123 d     KYC/CDD/EDD and underlying methodologies     Yes       123 d     KYC/CDD/EDD and underlying methodologies     Yes       123 d     Name Screening & List Management     Yes       123 f     Reporting/Metrics & Management Information     Yes       123 g     Suspicious Activity Filing     Yes       123 h     Technology     Yes       123 i     Transaction Monitoring     Yes       123 i     Transaction Monitoring for sanctions     Yes       123 i     Transaction Screening including for sanctions     Yes       123 i     Other (specify)     Yes       123 i     Other (specify)     Yes       124     Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?     Yes       125     Confirm that all responses provided in the above section are representative of all the LE's banches     Yes       125 a     If N, clarify which questions the difference/s relate to and the branch/se states to and the branch/se sthat this applies to.       125 a     <	122 b	External Third Party	
123 a     AML, CTF, ABC, Fraud and Sanctions policy and procedures     Yes       123 b     Enterprise Wide Risk Assessment     Yes       123 c     Governance     Yes       123 d     KYC/CDD/EDD and underlying methodologies     Yes       123 d     KYC/CDD/EDD and underlying methodologies     Yes       123 e     Name Screening & List Management     Yes       123 f     Reporting/Metrics & Management Information     Yes       123 g     Suspicious Activity Filing     Yes       123 h     Technology     Yes       123 i     Transaction Screening Including for sanctions     Yes       123 i     Trainsing & Education     Yes       123 i     Training & Education     Yes       123 i     Other (specify)     Yes       124     Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?     Yes       125     Confirm that all responses provided in the above section are representative of all the LE's branches     Yes       125 a     If N, clarify which questions the difference's relate to and the branches that this applies to.     Yes       126     If appropriate, provide any additional information/context to the answers in this section.     Yes       127     Does the Entity have policies in place addressing fraud risk?     Yes       128 <td< td=""><td>123</td><td></td><td></td></td<>	123		
procedures     Yes       123 b     Enterprise Wide Risk Assessment     Yes       123 c     Governance     Yes       123 d     KYC/CDD/EDD and underlying methodologies     Yes       123 d     Name Screening & List Management     Yes       123 f     Reporting/Metrics & Management Information     Yes       123 g     Suspicious Activity Filing     Yes       123 h     Technology     Yes       123 i     Transaction Monitoring     Yes       123 k     Training & Education     Yes       123 l     Other (specify)     Yes       124     Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?     Yes       125     Confirm that all responses provided in the above section are representative of all the LE's branches     Yes       125 a     If N, Carify which questions the difference/s relate to and the branch/es that this applies to.     Yes       126     If appropriate, provide any additional information/context to the answers in this section.     Yes       127     Does the Entity have policies in place addressing frau risk?     Yes       128     Does the Entity have a dedicated team responsible     Yes			
123 b       Enterprise Wide Risk Assessment       Yes         123 c       Governance       Yes         123 d       KYC/CDD/EDD and underlying methodologies       Yes         123 d       Name Screening & List Management       Yes         123 f       Reporting/Metrics & Management Information       Yes         123 g       Suspicious Activity Filing       Yes         123 h       Technology       Yes         123 i       Transaction Monitoring       Yes         123 i       Transaction Monitoring including for sanctions       Yes         123 i       Transaction Screening including for sanctions       Yes         123 i       Transaction Screening including for sanctions       Yes         123 k       Training & Education       Yes         123 l       Other (specify)       Yes         124       Are adverse findings from internal & external audit tracked to completeness?       Yes         125       Confirm that all responses provided in the above section and assessed for adequacy and completeness?       Yes         125 a       If Appropriate, provide any additional information/context to the answers in this section.       Yes         126       If appropriate, provide any additional information/context to the answers in this section.       Yes         127 <td>123 a</td> <td></td> <td>Yes</td>	123 a		Yes
123 c     Governance     Yes       123 d     KYC/CDD/EDD and underlying methodologies     Yes       123 e     Name Screening & List Management     Yes       123 f     Reporting/Metrics & Management Information     Yes       123 g     Suspicious Activity Filing     Yes       123 h     Technology     Yes       123 i     Transaction Monitoring     Yes       123 i     Transaction Screening including for sanctions     Yes       123 k     Training & Education     Yes       123 k     Training & Education     Yes       123 l     Other (specify)     Yes       124     Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?     Yes       125     Confirm that all responses provided in the above section are representative of all the LE's branches     Yes       125 a     If N, clarity which questions the difference/s relate to and the branch/es that this applies to.     Yes       126     If appropriate, provide any additional information/context to the answers in this section.     Yes       127     Does the Entity have policies in place addressing fraud risk?     Yes			
123 d     KYC/CDD/EDD and underlying methodologies     Yes       123 e     Name Screening & List Management     Yes       123 f     Reporting/Metrics & Management Information     Yes       123 g     Suspicious Activity Filing     Yes       123 h     Technology     Yes       123 I     Transaction Monitoring     Yes       123 I     Transaction Screening including for sanctions     Yes       123 I     Transaction Screening including for sanctions     Yes       123 I     Transaction Screening including for sanctions     Yes       123 I     Other (specify)     Yes       124     Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?     Yes       125     Confirm that all responses provided in the above section are representative of all the LE's branches     Yes       125 a     If N, clarify which questions the difference/s relate to and the branch/es that this applies to.     Yes       126     If appropriate, provide any additional information/context to the answers in this section.     Yes       127     Does the Entity have policies in place addressing fraud risk?     Yes		· · · · ·	
123 e     Name Screening & List Management     Yes       123 f     Reporting/Metrics & Management Information     Yes       123 g     Suspicious Activity Filing     Yes       123 h     Technology     Yes       123 i     Transaction Monitoring     Yes       123 i     Transaction Screening including for sanctions     Yes       123 i     Transaction Screening including for sanctions     Yes       123 i     Transaction Screening including for sanctions     Yes       123 i     Training & Education     Yes       123 i     Other (specify)     Yes       124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?     Yes       125 Confirm that all responses provided in the above section are representative of all the LE's branches     Yes       125 a     If N, claffy which questions the difference/s relate to and the branch/es that this applies to.     Yes       126 If appropriate, provide any additional information/context to the answers in this section.     Yes       127 Does the Entity have policies in place addressing fraud risk?     Yes       128 Does the Entity have a dedicated team responsible     Yes			
123 f       Reporting/Metrics & Management Information       Yes         123 g       Suspicious Activity Filing       Yes         123 h       Technology       Yes         123 i       Transaction Monitoring       Yes         123 j       Transaction Screening including for sanctions       Yes         123 k       Training & Education       Yes         123 l       Other (specify)       Yes         124       Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?       Yes         125       Confirm that all responses provided in the above section are representative of all the LE's branches       Yes         125 a       If N, clarify which questions the difference/s relate to and the branch/es that this applies to.       Yes         126       If appropriate, provide any additional information/context to the answers in this section.       Yes         127       Does the Entity have policies in place addressing fraud risk?       Yes         128       Does the Entity have a dedicated team responsible       Yes		, , , ,	
123 g       Suspicious Activity Filing       Yes         123 h       Technology       Yes         123 i       Transaction Monitoring       Yes         123 j       Transaction Screening including for sanctions       Yes         123 k       Training & Education       Yes         123 k       Training & Education       Yes         123 l       Other (specify)       Yes         124       Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?       Yes         125       Confirm that all responses provided in the above section are representative of all the LE's branches       Yes         125 a       If N, clarify which questions the difference/s relate to and the branch/es that this applies to.       Yes         126       If appropriate, provide any additional information/context to the answers in this section.       Yes         127       Does the Entity have policies in place addressing fraud risk?       Yes         128       Does the Entity have a dedicated team responsible       Yes		5 S	
123 h     Technology     Yes       123 i     Transaction Monitoring     Yes       123 j     Transaction Screening including for sanctions     Yes       123 k     Training & Education     Yes       123 l     Training & Education     Yes       123 l     Training & Education     Yes       123 l     Other (specify)     Yes       124     Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?     Yes       125     Confirm that all responses provided in the above section are representative of all the LE's branches     Yes       125 a     If N, clarify which questions the difference's relate to and the branch/es that this applies to.     Yes       126     If appropriate, provide any additional information/context to the answers in this section.     Yes       127     Does the Entity have policies in place addressing fraud risk?     Yes       128     Does the Entity have a dedicated team responsible     Yes			
123 i       Transaction Monitoring       Yes         123 j       Transaction Screening including for sanctions       Yes         123 k       Training & Education       Yes         123 l       Other (specify)       Yes         124       Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?       Yes         125       Confirm that all responses provided in the above section are representative of all the LE's branches       Yes         125 a       If N, clarify which questions the difference/s relate to and the branch/es that this applies to.       Yes         126       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.         127       Does the Entity have policies in place addressing fraud risk?       Yes         128       Does the Entity have a dedicated team responsible       Yes	-		
123 k       Training & Education       Yes         123 l       Other (specify)       Yes         124       Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?       Yes         125       Confirm that all responses provided in the above section are representative of all the LE's branches       Yes         125 a       If N, clarify which questions the difference/s relate to and the branch/es that this applies to.       Yes         126       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.         127       Does the Entity have policies in place addressing fraud risk?       Yes         128       Does the Entity have a dedicated team responsible       Yes			
123 I       Other (specify)         124       Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?         125       Confirm that all responses provided in the above section are representative of all the LE's branches       Yes         125 a       If N, clarify which questions the difference/s relate to and the branch/es that this applies to.       Yes         126       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.         127       Does the Entity have policies in place addressing fraud risk?       Yes         128       Does the Entity have a dedicated team responsible       Yes	123 j	Transaction Screening including for sanctions	Yes
124       Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?       Yes         125       Confirm that all responses provided in the above section are representative of all the LE's branches       Yes         125 a       If N, clarify which questions the difference/s relate to and the branch/es that this applies to.       Yes         126       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.         127       Does the Entity have policies in place addressing fraud risk?       Yes         128       Does the Entity have a dedicated team responsible       Yes		Training & Education	Yes
tracked to completion and assessed for adequacy and completeness?     Yes       125     Confirm that all responses provided in the above section are representative of all the LE's branches     Yes       125 a     If N, clarify which questions the difference/s relate to and the branch/es that this applies to.     Yes       126     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.       127     Does the Entity have policies in place addressing fraud risk?     Yes       128     Does the Entity have a dedicated team responsible     Yes	123	Other (specify)	
tracked to completion and assessed for adequacy and completeness?     Yes       125     Confirm that all responses provided in the above section are representative of all the LE's branches     Yes       125 a     If N, clarify which questions the difference/s relate to and the branch/es that this applies to.     Yes       126     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.       127     Does the Entity have policies in place addressing fraud risk?     Yes       128     Does the Entity have a dedicated team responsible     Yes			
tracked to completion and assessed for adequacy and completeness?     Yes       125     Confirm that all responses provided in the above section are representative of all the LE's branches     Yes       125 a     If N, clarify which questions the difference/s relate to and the branch/es that this applies to.     Yes       126     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.       127     Does the Entity have policies in place addressing fraud risk?     Yes       128     Does the Entity have a dedicated team responsible     Yes			
tracked to completion and assessed for adequacy and completeness?       Yes         125       Confirm that all responses provided in the above section are representative of all the LE's branches       Yes         125 a       If N, clarify which questions the difference/s relate to and the branch/es that this applies to.       Yes         126       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.         127       Does the Entity have policies in place addressing fraud risk?       Yes         128       Does the Entity have a dedicated team responsible       Yes			
and completeness?     Iteration       125     Confirm that all responses provided in the above section are representative of all the LE's branches     Yes       125 a     If N, clarify which questions the difference/s relate to and the branch/es that this applies to.     Yes       126     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.       127     Does the Entity have policies in place addressing fraud risk?     Yes       128     Does the Entity have a dedicated team responsible     Yes	124	-	
125       Confirm that all responses provided in the above section are representative of all the LE's branches       Yes         125 a       If N, clarify which questions the difference/s relate to and the branch/es that this applies to.       Yes         126       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.         127       Does the Entity have policies in place addressing fraud risk?       Yes         128       Does the Entity have a dedicated team responsible       Yes			Yes
section are representative of all the LE's branches       Yes         125 a       If N, clarify which questions the difference/s relate to and the branch/es that this applies to.         126       If appropriate, provide any additional information/context to the answers in this section.         126       If appropriate, provide any additional information/context to the answers in this section.         127       Does the Entity have policies in place addressing fraud risk?         128       Does the Entity have a dedicated team responsible	125		
125 a       If N, clarify which questions the difference/s relate to and the branch/es that this applies to.         126       If appropriate, provide any additional information/context to the answers in this section.         14. FRAUD         127       Does the Entity have policies in place addressing fraud risk?         128       Does the Entity have a dedicated team responsible	125		Yes
and the branch/es that this applies to.         126       If appropriate, provide any additional information/context to the answers in this section.         14. FRAUD         127       Does the Entity have policies in place addressing fraud risk?         128       Does the Entity have a dedicated team responsible	125 a		
126       If appropriate, provide any additional information/context to the answers in this section.         14. FRAUD         127       Does the Entity have policies in place addressing fraud risk?         128       Does the Entity have a dedicated team responsible			
14. FRAUD       127     Does the Entity have policies in place addressing fraud risk?       128     Does the Entity have a dedicated team responsible			
14. FRAUD       127     Does the Entity have policies in place addressing fraud risk?       128     Does the Entity have a dedicated team responsible			
14. FRAUD       127     Does the Entity have policies in place addressing fraud risk?       128     Does the Entity have a dedicated team responsible	126	If appropriate, provide any additional	
127     Does the Entity have policies in place addressing fraud risk?     Yes       128     Does the Entity have a dedicated team responsible     Yes			
127     Does the Entity have policies in place addressing fraud risk?     Yes       128     Does the Entity have a dedicated team responsible     Yes			
127     Does the Entity have policies in place addressing fraud risk?     Yes       128     Does the Entity have a dedicated team responsible     Yes			
127     Does the Entity have policies in place addressing fraud risk?     Yes       128     Does the Entity have a dedicated team responsible     Yes	14. FRAUD		·
128 Does the Entity have a dedicated team responsible		Does the Entity have policies in place addressing	
for preventing & detecting fraud?	128		Yes
		for preventing & detecting fraud?	

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

## Declaration Statement

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

<u>City National Bank an RBC Company</u> (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

## Steven Bash

STeven J Bash

I, <u>Nancy Schicker</u> (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

\_August 28, 2023 (Signature & Date)

June 30, 2023
 (Signature & Date)