the Wolfsberg Group

Financial Institution Name: Location (Country) :

BANCO BILBAO VIZCAYA ARGENTARIA S.A SPAIN

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.

	TY & OWNERSHIP	
1	Full Legal Name	BANCO BILBAO VIZCAYA ARGENTARIA S.A
2	Append a list of foreign branches which are covered by this questionnaire	London, Frankfurt, Brussels, New York, Taipei, Seoul, Paris, Hong Kong, Milán, Tokyo, Singapore, Portugal, Shanghai.
3	Full Legal (Registered) Address	Plaza de San Nicolás, 4- , 48005 - Bilbao
4	Full Primary Business Address (if different from above)	Calle Azul, 4, 28050, Madrid
5	Date of Entity incorporation/establishment	Founded in 1857
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	BBVA:SM Madrid, Barcelona, Bilbao, Valencia, London, Mexico, New York.
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	0%
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Name of primary financial regulator/supervisory authority	BANCO DE ESPAÑA
11	Provide Legal Entity Identifier (LEI) if available	K8MS7FD7N5Z2WQ51AZ71
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	None

Jurisdiction of licensing authority and regulator of ultimate parent SPA SPA 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 d Transactional Banking Yes	AIN
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 d Transactional Banking Yes	
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14 b Private Banking Yes 14 c Commercial Banking Yes 14 d Transactional Banking Yes	
14 c Commercial Banking Yes 14 d Transactional Banking Yes	
14 d Transactional Banking Yes	
14 e Investment 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 Other (please explain)	
Does the Entity have a significant (10% or more)	
portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident	
customers? (Non-resident means customers primarily No	
resident in a different jurisdiction to the location	
where bank services are provided)	
15 a If Y, provide the top five countries where the non-	
resident customers are located.	
16 a Number of employees 1000	01+
	ater than \$500 million
17 Confirm that all responses provided in the above	
Section are representative or all the LES branches.	
17 a If N, clarify which questions the difference/s relate to	ase see annexes for all branches
and the branch/es that this applies to.	
18 If appropriate, provide any additional	
information/context to the answers in this section.	
2. PRODUCTS & SERVICES	
19 Does the Entity offer the following products and	
services:	
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19 a1i	Does the Entity have processes and procedures	
	in place to identify downstream relationships with MSBs /MVTSs/PSPs?	Yes
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	Yes
19 f	International Cash Letter	Yes
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	Yes
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	Yes
19 i3	Virtual Asset Service Providers (VASPs)	Yes
19 i4	eCommerce Platforms	Yes
19 i5	Other - Please explain	
19 j	Private Banking	Both
19 k	Remote Deposit Capture (RDC)	No
19 l	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	Identification and verification
19 p2	Wire transfers	Yes
19 p2a	If yes, state the applicable level of due diligence	Identification and verification
19 p3	Foreign currency conversion	Yes
19 p3a	If yes, state the applicable level of due diligence	Identification and verification
19 p4	Sale of Monetary Instruments	Yes
19 p4a	If yes, state the applicable level of due diligence	Identification and verification
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	BBVA accepts non account customers, as it acts as receiver for Tax and Social Security and other Spanish authorities, and clients can walk in and pay their duties. BBVA has no appetite for other type of walk-in customers. In the mentioned cases, the bank duly identifies the customers according to Spanish and European best practices.
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	No
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Please see annexes for all branches
21	If appropriate, provide any additional information/context to the answers in this section.	
3. AMI 4	CTF & 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	
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	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 in Question 29.	No
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes
26 a	If Y, provide further details	Only one company 100% owned by the group, for back office and administrative tasks
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Please see annexes for all branches
29	If appropriate, provide any additional information/context to the answers in this section.	Clarification #24: It is composed of several policies reviewed on an ongoing basis. Not necessarily every year, but some with a higher frequency. Approved at the level required by internal governance
4. ANT	I BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes

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 d	Third parties to which specific compliance activities	res
	subject to ABC risk have been outsourced	Yes
42 f	Non-employed workers as appropriate (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.	Regarding question 42F, It should be noted that BBVA does not provide training to all non employed workers but it does provide training to certain high risk non-employed workers such as agents. BBVA requires all its third parties to certify their commitment to comply with all applicable anticorruption laws.
5 AML C	TF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
40	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	Yes
48 a1	If Y, does the Entity retain a record of the results?	No
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	Yes
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Von
49 a 49 e	Prohibit dealing with another entity that provides services to shell banks	Yes Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
ı		
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes

49 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
491	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.	Clarification #48 a): BBVA Sanctions policies comply with OFAC regulations. Other AML policies are not gapped against US standards necessarily.
C AME OT	F & SANCTIONS RISK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 a	Client	Yes
54 b	Product	Yes
54 c	Channel	Yes
54 d		
55	Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes
	Does the Entity's AML & CTF EWRA cover the	
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Yes Yes
55 a 55 b 55 c	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
55 a 55 b	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Yes Yes
55 a 55 b 55 c 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes Yes Yes Yes Yes Yes Yes Yes
55 a 55 b 55 c 55 d 55 e 55 f 55 g	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	Yes Yes Yes Yes Yes Yes Yes Yes
55 a 55 b 55 c 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes Yes Yes Yes Yes Yes Yes Yes
55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	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
55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes Yes Yes Yes Yes Yes Yes Yes
55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes Yes Yes Yes Yes Yes Yes Yes
55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 a 57 a 57 a 57 b	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
55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 a 57 a 57 b 57 c	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
55 a 55 b 55 c 55 d 55 g 55 h 56 a 57 a 57 c 57 d	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
55 a 55 b 55 c 55 d 55 c 55 d 55 g 55 h 56 a 57 a 57 a 57 c 57 d 58	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
55 a 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 a 57 c 57 d 58 a 58 a	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
55 a 55 b 55 c 55 d 55 c 55 d 55 g 55 h 56 a 57 a 57 a 57 c 57 d 58	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

58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
58 g	Has the Entity's Sanctions EWRA been completed in	163
59	the last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
61	If appropriate, provide any additional	
01	information/context to the answers in this section.	
7 KYC (CDD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	25%
67	Does the due diligence process result in customers receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes Vac
67 a5 67 a6	Adverse Information Other (specify)	Yes Lenght of the relationship and AML screenings
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes
68 a	If Y, is this at:	Title in various and in the contract of the first of the contract of the contr
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4 68 a4a	Other If yes, please specify "Other"	Yes Irregular operations
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:	A service of the second service of the second service of the service of the second service of the service of th
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

,		
69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
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	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	EDD on risk-based approach
76 b	Respondent Banks	EDD on risk-based approach
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	No EDD/restriction or prohibition
76 d	Extractive industries	No EDD/restriction or prohibition
76 e	Gambling customers	EDD on risk-based approach
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	No EDD/restriction or prohibition
76 h	MSB/MVTS customers	EDD on risk-based approach
76 i	Non-account customers	No EDD/restriction or prohibition
76 j	Non-Government Organisations	No EDD/restriction or prohibition
	Non-resident customers	·
76 k 76 l		No EDD/restriction or prohibition
	Nuclear power	No EDD/restriction or prohibition
76 m	Payment Service Providers	EDD on risk-based approach
76 n	PEPs	EDD on risk-based approach
76 o	PEP Close Associates	EDD on risk-based approach
76 p	PEP Related	EDD on risk-based approach
76 q	Precious metals and stones	No EDD/restriction or prohibition
76 r	Red light businesses/Adult entertainment	No EDD/restriction or prohibition
76 s	Regulated charities	No EDD/restriction or prohibition
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	No EDD/restriction or prohibition
76 v	Unregulated charities	No EDD/restriction or prohibition
76 w	Used Car Dealers	No EDD/restriction or prohibition
76 x	Virtual Asset Service Providers	EDD on risk-based approach
76 y	Olher (specify)	MVTS/MSB customers are restricted and need authorization to be clients
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:	Both
	es the Entity have specific procedures for	
	oarding entities that handle client money such as yers, accountants, consultants, real estate agents?	Yes
	es the Entity perform an additional control or	Yes
	lity review on clients subject to EDD?	
	firm that all responses provided in the above	No
	tion are representative of all the LE's branches	
	N, clarify which questions the difference/s relate to	See annexes for Belgium, Germany, Hong Kong, London, Milan, Paris, Singapore and Taiwan
an	d the branch/es that this applies to	branches.
	•	
82 If ap	propriate, provide any additional	NOT IN THE CONTROL OF
1 1	rmation/context to the answers in this section.	#65c: Key controllers are identified when they coincide with the Spanish law concept of beneficial owners (over 25%).
		Official (Over 2070).
	IO O DEDORTNO	
8. MONITORIN	IG & REPORTING	
83 Does	s the Entity have risk based policies, procedures	
and	monitoring processes for the identification and	Yes
repo	orting of suspicious activity?	
	at is the method used by the Entity to monitor	Automated
trans	sactions for suspicious activities?	
0.4 - 16	nanual or combination colocted, angelfumbet	
	manual or combination selected, specify what be of transactions are monitored manually	
l ^{typ}	of transactions are monitored manually	
	!	
	automated or combination selected, are internal	Vendor-sourced tools
84 b sys	stem or vendor-sourced tools used?	
84 b1 If	f 'Vendor-sourced tool' or 'Both' selected, what is	SAS AML
	he name of the vendor/tool?	SAS AIVIL
"	The Haline of the Velldomoon	
84 b2 V	When was the tool last updated?	< 1 year
	When was the automated Transaction Monitoring	< 1 year
а	application last calibrated?	•
Dog	es the Entity have regulatory requirements to	
	ort suspicious transactions?	Yes
	sit on opposite transaction of	
85 a If Y	Y, does the Entity have policies, procedures and	
	ocesses to comply with suspicious transaction	Yes
	porting requirements?	
	-	
86 Doe	es the Entity have policies, procedures and	
	cesses to review and escalate matters arising from	Yes
	monitoring of customer transactions and activity?	
	s the Entity have a data quality management	
prog	gramme to ensure that complete data for all	Yes
trans	sactions are subject to monitoring?	
	di Cutti la cutti di	
	s the Entity have processes in place to respond	V
	tequest For Information (RFIs) from other entities timely manner?	Yes
ın a	unory manuar:	
	es the Entity have processes in place to send	
	uests for Information (RFIs) to their customers in	Yes
a tim	nely manner?	
90 Con	firm that all responses provided in the above	
	tion are representative of all the LE's branches	Yes
90 a If N	N, clarify which questions the difference/s relate to	On a new of a branches
	nd the branch/es that this applies to	See annexes for branches
	• •	
	· ·	
	propriate, provide any additional	
04 16	annuar order sov solullots	
	rmation/context to the answers in this section.	
infor	rmation/context to the answers in this section.	
9. PAYMENT T	rmation/context to the answers in this section. RANSPARENCY	
9. PAYMENT T	rmation/context to the answers in this section.	Voc
9. PAYMENT T 92 Doe	rmation/context to the answers in this section. RANSPARENCY	Yes

93	Does the Entity have policies, procedures and	
	processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	EU Regulation 847/2015
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	See annexes for branches
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC	 TIONS	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	No
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Automated
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Both
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	FIRCOSOFT
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	<1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes

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 (i.e. reference data)
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners (i.e. reference data)
106 с	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners (i.e. reference data)
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners (i.e. reference data)
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners (i.e. reference data)
106 f	Other (specify)	BBVA adheres to local AML screening requirements in the jurisdictions where it has presence.
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?	Yes
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Please, see annexes for branches.
110	If appropriate, provide any additional information/context to the answers in this section.	#99 We have procedures to avoid prohibitions within jurisdictions where we have presence and from EU, UN, and OFAC, but cannot prevent local prohibitions in the rest of jurisdictions where our correspondent banks are established. #108: Repr office in Cuba with no banking activity, only institutional relations.
11. TRAINI	ING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 с	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 112 b	Board and Senior Committee Management 1st Line of Defence	Yes
112 b	2nd Line of Defence	Yes Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	Yes
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?	
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches	Yes

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
12 OLIALIT	Y ASSURANCE /COMPLIANCE TESTING	
12. QUALIT	Does the Entity have a program wide risk based	
	Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	,
120	If appropriate, provide any additional information/context to the answers in this section.	
13. AUDIT		
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Compenent-based reviews
122 b	External Third Party	Yearly
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e 123 f	Name Screening & List Management Reporting/Metrics & Management Information	Yes
123 f	Suspicious Activity Filing	Yes Yes
123 g 123 h	Technology	Yes
123 ii	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
14. FRAU 127	Does the Entity have policies in place addressing	Yes
128	fraud risk? Does the Entity have a dedicated team responsible	Yes
l	for preventing & detecting fraud?	100

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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.	
Anti- Money BANCO BI every elfort The Financi legal and re	LBAO VIZCAYA ARGENTARIA, S.A. (Financial Institut to remain in full compliance with all applicable financial crime law ial Institution understands the critical importance of having effecting gulatory obligations.	ting or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Crimes Compliance OR equivalent) ion name) is fully committed to the fight against financial crime and makes s, regulations and standards in all of the jurisdictions in which it does business and holds accounts. We and sustainable controls to combat financial crime in order to protect its reputation and to meet its against to transactions in international payments and has adopted is committed to adopting these
The informa	al Institution further certifies it complies with / is working to compl tion provided in this Wolfsberg CBDDQ will be kept current and v lal institution commits to file accurate supplemental information or	
I, SANTIA	GO HERNÁNDEZ (Global Head o	of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that my honest belief, and that I am authorised to execute this declaration on behalf of the Financial
, EDUAR	CBDDQ are complete and correct to my honest belief, and that i a	13/2024



Financial Institution Name:	
Location (Country) :	

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	
2	Append a list of foreign branches which are covered	
	by this questionnaire	
3	Full Legal (Registered) Address	
	an Logar (regionarou) / nauross	
4	Full Primary Business Address (if different from	
4	above)	
	above)	
5	Date of Entity incorporation/establishment	
6	Select type of ownership and append an ownership	
	chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	
6 b	Member Owned/Mutual	
6 c	Government or State Owned by 25% or more	
6 d	Privately Owned	
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer	
	shares	
8	Does the Entity, or any of its branches, operate under	
	an Offshore Banking License (OBL)?	
8 a	If Y, provide the name of the relevant branch/es	
o a	which operate under an OBL	
	million operate and all object	
0	Does the Bank have a Virtual Bank License or	
9	provide services only through online channels?	
40		
10	Name of primary financial regulator/supervisory authority	
	authority	
11	Provide Legal Entity Identifier (LEI) if available	
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	
	1	l .

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

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	
19 c	Cross-Border Remittances	
19 d	Domestic Bulk Cash Delivery	
19 e	Hold Mail	
19 f	International Cash Letter	
19 g	Low Price Securities	
19 h	Payable Through Accounts	
19 i	Payment services to non-bank entities who may	
	then offer third party payment services to their customers?	
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	
19 j	Private Banking	
19 k	Remote Deposit Capture (RDC)	
19 I	Sponsoring Private ATMs	
19 m	Stored Value Instruments	
19 n	Trade Finance	
19 o	Virtual Assets	
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	
19 p4a 19 p5	If yes, state the applicable level of due diligence If you offer other services to walk-in customers	
19 þ5	please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	
3. AML, C	TF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum	
	AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	
22 b	Adverse Information Screening	
22 c	Beneficial Ownership	
22 d	Cash Reporting	
22 e	CDD	
22 f	EDD	
22 g	Independent Testing	
22 h	Periodic Review	
22 i	Policies and Procedures	
22 j	PEP Screening	
22 k	Risk Assessment	
22 I	Sanctions	

27 Taming and Excellent 28 How many full sine employees are in the Entity's MAL, CTF & Sanctions Deployees are in the Entity's AMA, CTF & Sanctions Deployees are in the Entity's AMA, CTF & Sanctions Deployees are in the Entity's AMA, CTF & Sanctions Deploy approved attested annually by the Book or equivalent Review of the CTF & Sanctions Deploy approved attested annually by the Book or equivalent Review or experience in Cuestion 29. 28 Dees the Sourd receive, seases, and challenge purposes or experience or consideration of the CTF & Sanctions programme? 29 Dees the Entity was the parties to curry out anny components of the Entity and the CTF & Sanctions programme? 20 Dees the Entity was a whistleblower policity? 20 Dees the Entity was a whistleblower policity? 21 Dees the anny have a whistleblower policity? 22 Dees the Entity was a whistleblower policity? 23 Dees the anny have a whistleblower policity? 24 Dees the Entity was a whistleblower policity? 25 Dees the Entity was a whistleblower policity? 26 Dees the Entity was a whistleblower policity? 27 Dees the anny have a whistleblower policity? 28 Dees the Entity was a whistleblower policity? 29 If appropriate, provide any additional information to the Entity that the Entity documents of policies to a fine the Entity that the Entity documents of policies and procedures consistent with a policies bed Script and the Entity that the Entity documents of policies and procedures consistent with a policies bed Script and the Entity that the Entity documents to insacrably prevent, docted and report theory and completion? 29 This is the Entity that the Entity documents and procedures consistent with applicable Script and the Entity that the Entity documents of policies and procedures consistent with applicable Script and the Entity that the Entity and Completion or receiving of anything of value, directly or indirectly. If Impropriety indirected to the ABC programme? 30 Dees the Entity thave an entity that the Entitle Control or indirectly. If Impropriety	22 m	Suspicious Activity Reporting	
22 a many full stime employees are in the Entity's AMU, CTF & Sanctions Compliance (Part AMU, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Monagement (Part AMU, CTF & Sanctions policy product at least annually by the Board or equivalent Senior Monagement (Part AMU, CTF & Sanctions policy product at least annually by the Board or equivalent Senior Monagement (Part AMU, CTF, & Sanctions programme?) 25			
ANL, CF & Sanctions policy agreement in the Entity's ANL, CF & Sanctions policy approved at steet annually by the Board or equivalent Senior in Cuestion 2. See the Board receive, was asses, and of balleage regular reporting on the status of the ANL, CF & Sanctions policy approved at steet annually by the Board receive, was seen and or sequivalent policy and the status of the ANL, CF & Sanctions programme? Board receive, was assessed and the Company of the Sanctions programme? Board receive, was assessed and the Sanctions programme? Board receive, was the status of the ANL, CF & Sanctions programme? Board Receive, was assessed and the Sanctions programme? Board Receive and the Sanctions and the Sanctions and the bearanches that this applies to and the sanction of the Sanction and the Sa		· ·	
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components detailed below: 40 a Potential liability created by intermediaries and		is the net result of the controls effectiveness and the inherent risk assessment?	
		components detailed below:	
	40 a		

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	
40 с	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	
40 e	Changes in business activities that may materially increase the Entity's corruption risk	
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	
42 b	1st Line of Defence	
42 c	2nd Line of Defence	
42 d	3rd Line of Defence	
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	
42 f	Non-employed workers as appropriate (contractors/consultants)	
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
5. AML, C	TF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	
46 b	Terrorist financing	
46 c	Sanctions violations	
47	Are the Entity's policies and procedures updated at least annually?	
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	
48 b1	If Y, does the Entity retain a record of the results?	
48 b1 49	If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that:	
48 b1	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	
48 b1 49	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	
48 b1 49 49 a	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	
48 b1 49 49 a 49 b	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	
48 b1 49 49 a 49 b 49 c 49 d	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	
48 b1 49 49 a 49 b 49 c 49 d 49 e	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	
48 b1 49 49 a 49 b 49 c 49 d 49 e	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 NBFls Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities	
48 b1 49 49 a 49 b 49 c 49 d 49 e	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 NBFls Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for	

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

58 e	Name Screening	
58 f	Transaction Screening	
58 g	Training and Education	
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	
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	
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?	
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?	
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	
64 b	Expected activity	
64 c	Nature of business/employment	
64 d	Ownership structure	
64 e	Product usage	
64 f	Purpose and nature of relationship	
64 g	Source of funds	
64 h	Source of wealth	
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	
65 a1	Are ultimate beneficial owners verified?	
65 b		
	Authorised signatories (where applicable)	
65 c	Key controllers	
65 d	Other relevant parties	
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	
67	Does the due diligence process result in customers receiving a risk classification?	
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	
67 a2	Geography	
67 a3	Business Type/Industry	
67 a4	Legal Entity type	
67 a5	Adverse Information	
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	
68 a	If Y, is this at:	
68 a1	Onboarding	
68 a2	KYC renewal	
68 a3	Trigger event	
68 a4	Other	
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	
69 a	If Y, is this at:	
69 a1	Onboarding	
69 a2	KYC renewal	

69 a3	Trigger event	
69 a3 70	Trigger event	
	What is the method used by the Entity to screen for Adverse Media/Negative News?	
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
71 a	If Y, is this at:	
71 a1	Onboarding	
71 a2	KYC renewal	
71 a3	Trigger event	
72	What is the method used by the Entity to screen PEPs?	
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	
74 a	If yes, select all that apply:	
74 a1	Less than one year	
74 a2	1 – 2 years	
74 a3	3 – 4 years	
74 a4 74 a5	5 years or more Trigger-based or perpetual monitoring reviews	
74 a5 74 a6	Other (Please specify)	
7440	Outer (Frease specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	
76 b	Respondent Banks	
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	
76 d	Extractive industries	
76 e	Gambling customers	
76 f	General Trading Companies	
76 g	Marijuana-related Entities	
76 h	MSB/MVTS customers	
76 i	Non-account customers	
76 j	Non-Government Organisations	
76 k	Non-resident customers	
76 I	Nuclear power	
76 m	Payment Service Providers	
76 n	PEPs	
76 o	PEP Close Associates	
76 p	PEP Related	
76 q	Precious metals and stones	
76 r	Red light businesses/Adult entertainment	
76 s	Regulated charities	
76 t	Shell banks	
76 u	Travel and Tour Companies	
76 v	Unregulated charities	
76 w	Used Car Dealers	
76 x 76 y	Virtual Asset Service Providers Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	

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

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
00 -	'	
93 a	FATF Recommendation 16	
93 b	Local Regulations	
93 b1	If Y, specify the regulation	
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC	TIONS	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	
102	What is the method used by the Entity for sanctions screening?	
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	
104	What is the method used by the Entity?	

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

115 а	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
12. QUALI	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based	
	Quality Assurance programme for financial crime (separate from the independent Audit function)?	
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
13. AUDIT		
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	
122 b	External Third Party	
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	
123 b	Enterprise Wide Risk Assessment	
123 c 123 d	Governance KYC/CDD/EDD and underlying methodologies	
123 u	Name Screening & List Management	
123 f	Reporting/Metrics & Management Information	
123 g	Suspicious Activity Filing	
123 h	Technology	
123 i	Transaction Monitoring	
123 j	Transaction Screening including for sanctions	
123 k 123 l	Training & Education Other (specify)	
1231	Outer (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	
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. FRAU	סנ	
127	Does the Entity have policies in place addressing fraud risk?	
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	
	•	

129	Does the Entity have real time monitoring to detect fraud?		
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?		
131	Confirm that all responses provided in the above section are representative of all the LE's branches		
131 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.		
<u>Declarat</u>	tion Statement		
Declaration	Group Correspondent Banking Due Diligence Questionnaire 2023 (CBI n Statement (To be signed by Global Head of Correspondent Banki y Laundering, Chief Compliance Officer, Global Head of Financial C	ng or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of	
every effor		on name) is fully committed to the fight against financial crime and makes regulations and standards in all of the jurisdictions in which it does business and holds accounts.	
	cial Institution understands the critical importance of having effective egulatory obligations.	e and sustainable controls to combat financial crime in order to protect its reputation and to meet its	
The Financ standards.		parties to transactions in international payments and has adopted/is committed to adopting these	
	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 Financ	cial Institution commits to file accurate supplemental information on	a timely basis.	
I, the answer Institution.		Correspondent Banking or equivalent), certify that I have read and understood this declaration, that my honest belief, and that I am authorised to execute this declaration on behalf of the Financial	
I,	, (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.		
	(Signature & Date		
	(Signature & Date)	

the Wolfsberg Group

Financial Institution Name: Location (Country) :

DDI/A D	
BBVA Bank	
	_
Taiwan	

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.

Question	As Allegrand & American Assert Answer
	BBVA Bank
n branches which are covered	Taipei branch
i) Address	Unit D, Level 45, Taipei 101 Tower, No.7 Xinyi Rd, Sec 5, Taipei City11049, Taiwan, ROC
Address (if different from	
ration/establishment	11/23/2011
nip and append an ownership	
% of shares publicly traded)	Please select
change traded on and ticker	
ual	Please select
Owned by 25% or more	Please select
	Please select
of shareholders or ultimate with a holding of 10% or more	
hares composed of bearer	
of its branches, operate under icense (OBL)?	Please select
e of the relevant branch/es an OBL	
Virtual Bank License or through online channels?	Please select
cial regulator/supervisory	Financial Supervisory Committee (FSC)
lentifier (LEI) if available	
ame of the ultimate parent (if completing the DDQ)	
a	ume of the ultimate parent (if

13	Jurisdiction of licensing authority and regulator of		
	ultimate parent		
14	Select the business areas applicable to the Entity		
14 a	Retail Banking	No E	=
14 b	Private Banking		T
14 c	Commercial Banking	No E	
14 d	Transactional Banking	· · · · · · · · · · · · · · · · · · ·	
	<u> </u>	Yes	
14 e	Investment Banking	No E	
14 f	Financial Markets Trading		
14 g	Securities Services/Custody	No	
14 h	Broker/Dealer	No	Y
14 i	Multilateral Development Bank	No	T
14 j	Wealth Management	No	
14 k	Other (please explain)		
15	Does the Entity have a significant (10% or more)	Г	_
	portfolio of non-resident customers or does it derive		
	more than 10% of its revenue from non-resident	l _{N-}	_
	customers? (Non-resident means customers primarily	No	~
	resident in a different jurisdiction to the location		
	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	1-50	
16 b	Total Assets	Between \$10 and \$100 million	=
17	Confirm that all responses provided in the above	les de la constant de	
	Section are representative of all the LE's branches.	Please select	
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
			1
18	If appropriate, provide any additional information/context to the answers in this section.		
2. PRODU	UCTS & SERVICES		iania.
19	Does the Entity offer the following products and	The state of the s	—
	services:		İ
19 a	Correspondent Banking	No E	_
19 a1	If Y		
19 a1 19 a1a	Does the Entity offer Correspondent Banking		
	services to domestic banks?	Please select	_
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	Please select	
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Please select	
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Please select	
19 a1e	Does the Entity allow downstream relationships with foreign banks?	Please select	
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	No	
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	No .	→
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?		
19 a1h1	MSBs	No	_
19 a1h2	MVTSs	No	=
19 a1h3	PSPs	No E	=
		<u> </u>	

19 a1i	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	No V
1	MSBs /MVTSs/PSPs?	Note that the second se
19 b	Cross-Border Bulk Cash Delivery	No C
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	
	Hold Mail	No Control Con
19 e	77-1-1	No
19 f	International Cash Letter	No
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may	
	then offer third party payment services to their customers?	No ·
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	No
19 i3	Virtual Asset Service Providers (VASPs)	No
19 14	eCommerce Platforms	No
19 i5	Other - Please explain	NO Landau
13 13	Other - Frease explain	
19 j	Private Banking	No E
19 k	Remote Deposit Capture (RDC)	No -
19	Sponsoring Private ATMs	No —
19 m	Stored Value Instruments	No
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	No
19 p1a	If yes, state the applicable level of due diligence	Please select
19 p2	Wire transfers	Yes
19 p2a	If yes, state the applicable level of due diligence	Identification and verification
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	Please select
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	Please select
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Please select
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.	
2 ABAL O'	TE & CANOTIONS PROCESSES	
3. AIVIL, C	TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 -	I	
22 a	Appointed Officer with sufficient experience/expertise	Please select
22 b	Adverse Information Screening	Please select
22 c	Beneficial Ownership	Please select
22 d	Cash Reporting	Please select
22 e	CDD	Please select
22 f	EDD	Please select
22 g	Independent Testing	Please select
22 h	Periodic Review	
22 ii	Policies and Procedures	Please select
	4	Please select
22 j	PEP Screening	Please select
22 k	Risk Assessment	Please select
	Sanctions	Please select
22	Ganctions	T teast soluti

22 m	Suspicious Activity Reporting	Please select
22 n	Training and Education	Please select
22 o	Transaction Monitoring	Please select
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	11-100
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Please select
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Please select
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No T
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Please select
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	Taipei branch does not deal with Cash
4. ANT	 BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Please select
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	No Vo
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Please select
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Please select
34	Is the Entity's ABC programme applicable to:	Not Applicable
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Please select
35 b	Includes enhanced requirements regarding interaction with public officials?	Please select
35 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Please select
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Please select .
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Please select
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Please select
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	No -
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Please select
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Please select
		The second secon

1.40.1			
40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes	•
40 с	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Please select	
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Please select	•
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Please select	
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Please select	
42	Does the Entity provide mandatory ABC training to:		
42 a	Board and senior Committee Management	No	
42 b	1st Line of Defence	Please select	
42 c	2nd Line of Defence	Please select	
42 d	3rd Line of Defence	No	
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	No	V
42 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable	•
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Please select	
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select	
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.		
E AME C	TE & CANOTIONS BOLLOISO & BROOKSUBSO		C 4 A 1 A 1 A 1
3. AIVIL, U	TF & SANCTIONS POLICIES & PROCEDURES		
140	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:		
46 a	Money laundering	Please select	
46 b	Terrorist financing	Please select	
46 c	Sanctions violations	Please select	
47	Are the Entity's policies and procedures updated at		
48	least annually?	Please select	
40	least annually? Has the Entity chosen to compare its policies and procedures against:	Please select	
48 a	Has the Entity chosen to compare its policies and		
	Has the Entity chosen to compare its policies and procedures against:	ı	
48 a	Has the Entity chosen to compare its policies and procedures against: U.S. Standards	Please select	
48 a 48 a1	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results?	Please select Please select	
48 a 48 a1 48 b	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards	Please select Please select Please select	
48 a 48 a1 48 b 48 b1	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	Please select Please select Please select	
48 a 48 a1 48 b 48 b1 49	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous	Please select Please select Please select Please select	
48 a 48 a1 48 b 48 b1 49 49 a	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for	Please select Please select Please select Please select Please select	
48 a 48 a1 48 b 48 b1 49 a 49 a	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide	Please select	
48 a 48 a1 48 b 48 b1 49 a 49 a 49 b	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks	Please select	
48 a 48 a1 48 b 48 b1 49 a 49 a 49 b	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides	Please select	
48 a 48 a1 48 b 48 b1 49 a 49 a 49 b 49 c	Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for	Please select	

49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Please select
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Please select
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Please select
49 1	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	Please select
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Please select
49 n	Outline the processes for the maintenance of internal "watchlists"	Please select
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Please select
51	Does the Entity have record retention procedures that comply with applicable laws?	Please select
51 a	If Y, what is the retention period?	Please select
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context to the answers in this section.	
6 AMI CT	F & SANCTIONS RISK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 a	Client	Please select
54 b	Product	Please select
54 c	Channel	Please select
54 d	Geography	Please select
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
55 a	Transaction Monitoring	Please select
55 b	Customer Due Diligence	Please select
55 c	PEP Identification	Please select
55 d	Transaction Screening	Please select
55 e	Name Screening against Adverse Media/Negative News	Please select
55 f	Training and Education	Please select
55 g	Governance	Please select
55 h 56	Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Please select Please select
56 a	If N, provide the date when the last AML & CTF EWRA was completed.	
57	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
57 a	Client	Please select
57 b	Product	Please select
57 c	Channel	Please select
57 d	Geography	Please select
58	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
58 a	Customer Due Diligence	Please select
		1 lease select
58 b	Governance	Please select
58 b 58 c	Governance List Management	
58 b	Governance	Please select

58 e	Name Screening	Please select
58 f	Transaction Screening	Please select
58 g	Training and Education	Please select
59	Has the Entity's Sanctions EWRA been completed in	
	the last 12 months?	Please select
59 a	If N, provide the date when the last Sanctions	
33 a	EWRA was completed.	
	LWITA was completed.	
ļ		
60	Confirm that all responses provided in the above	· · · · · · · · · · · · · · · · · · ·
	Section are representative of all the LE's branches	Please select
60 a	If N, clarify which questions the difference/s relate to	
• • •	and the branch/es that this applies to.	
	and the branchies that this applies to.	
61	If appropriate, provide any additional	
	information/context to the answers in this section.	
1		
7. KYC, C	DD and EDD	
62	Does the Entity verify the identity of the customer?	Please select
63	Do the Entity's policies and procedures set out when	
	CDD must be completed, e.g. at the time of	Please select
	onboarding or within 30 days?	
64	Which of the following does the Entity gather and	
"	retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Please select
64 b	Expected activity	Please select
64 c	Nature of business/employment	Please select
64 d	Ownership structure	Please select
64 e	Product usage	Please select
64 f	Purpose and nature of relationship	Please select
64 g	Source of funds	
		Please select
64 h	Source of wealth	Please select
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Please select
65 a1	Are ultimate beneficial owners verified?	Please select
65 b	Authorised signatories (where applicable)	Please select
65 c	Key controllers	Please select
65 d	Other relevant parties	
		Please select
66	What is the Entity's minimum (lowest) threshold	Please select
	applied to beneficial ownership identification?	
67	Does the due diligence process result in customers	Discourable 4
	receiving a risk classification?	Please select
67 a	If Y, what factors/criteria are used to determine the	
	customer's risk classification? Select all that apply:	
67 a1		
	Product Usage	Please select
67 a2	Geography	Please select
67 a3	Business Type/Industry	Please select
67 a4	Legal Entity type	Please select
67 a5	Adverse Information	Please select
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a	Please select
	part of your KYC process?	1 10000 301001
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	
00	screening customers for Adverse Media/Negative	
	News?	Please select
69 a	If Y, is this at:	
69 a1	Onboarding	Please select
69 a2	KYC renewal	Please select
	1	

CO - 2	1 T	le
69 a3	Trigger event	Please select
	What is the method used by the Entity to screen for Adverse Media/Negative News?	Please select
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?	Please select
71 a	If Y, is this at:	
71 a1	Onboarding	Please select
71 a2	KYC renewal	Please select
71 a3	Trigger event	Please select
72	What is the method used by the Entity to screen PEPs?	Please select
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?	Please select
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Please select
74 a	If yes, select all that apply:	
74 a1	Less than one year	Please select
74 a2	1 – 2 years	Please select
74 a3	3 – 4 years	Please select
74 a4	5 years or more	Please select
74 a5	Trigger-based or perpetual monitoring reviews	Please select
74 a6	Other (Please specify) Does the Entity maintain and report metrics on current	
	and past periodic or trigger event due diligence reviews?	Please select
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Prohibited
76 b	Respondent Banks	Please select
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Please select
76 c	Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	Please select
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	Please select
76 g	Marijuana-related Entities	Please select
76 h	MSB/MVTS customers	Please select
76 i	Non-account customers	
76 j		
•	Non-Government Organisations	Prohibited
76 k	Non-resident customers	Prohibited
76 I	Nuclear power	Please select
76 m	Payment Service Providers	EDD on risk-based approach
76 n	PEPs	Please select
76 o	PEP Close Associates	Please select
76 p	PEP Related	Please select
76 q	Precious metals and stones	Please select
76 r	Red light businesses/Adult entertainment	Please select
76 s	Regulated charities	Please select
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	Please select
76 v	Unregulated charities	Please select
76 w	Used Car Dealers	Please select
76 x	Virtual Asset Service Providers	Please select
76 y	Other (specify)	Fiedse Seieu
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	Please select

170			
78 a 79	If Y indicate who provides the approval:	Please select	
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Please select	
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Please select	
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select	
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to		
82	If appropriate, provide any additional information/context to the answers in this section.		
8. MONIT	ORING & REPORTING		
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Please select	
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual	
84 a	If manual or combination selected, specify what type of transactions are monitored manually		
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Please select	
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?		
84 b2	When was the tool last updated?	Please select	
84 b3	When was the automated Transaction Monitoring application last calibrated?	Please select	
85	Does the Entity have regulatory requirements to report suspicious transactions?	Please select	
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Please select	
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Please select	
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Please select	
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Please select	
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Please select	
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select	
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to		
91	If appropriate, provide any additional information/context to the answers in this section.		
9. PAYMENT TRANSPARENCY			
92	Does the Entity adhere to the Wolfsberg Group		
	Payment Transparency Standards?	Please select	

		
93	Does the Entity have policies, procedures and	
	processes to comply with and have controls in place	
	to ensure compliance with:	
93 a	FATF Recommendation 16	Please select
93 b	Local Regulations	
		Please select
93 b1	If Y, specify the regulation	
İ		
93 с	If N, explain	
" "	I (1) Oxpidii	
94	Does the Entity have controls to support the inclusion	
	of required and accurate originator information in	Please select
	cross border payment messages?	
95	Does the Entity have controls to support the inclusion	
	of required beneficiary information cross-border	Diagon palent
	payment messages?	Please select
95 a	If Y, does the Entity have procedures to include	
	beneficiary address including country in cross	Please select
	border payments?	
96	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches	Please select
96 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
	and the branchines that the appropries	
97	If appropriate, provide any additional	
	information/context to the answers in this section.	
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40 04116		
10. SANC		
98	Does the Entity have a Sanctions Policy approved by	
	management regarding compliance with sanctions	
	law applicable to the Entity, including with respect to	Please select
	its business conducted with, or through accounts held	
	at foreign financial institutions?	
99	Does the Entity have policies, procedures, or other	
	controls reasonably designed to prevent the use of	
	another entity's accounts or services in a manner	
	causing the other entity to violate sanctions	Please select
	prohibitions applicable to the other entity (including	
	prohibitions within the other entity's local jurisdiction)?	
100	<u> </u>	
100	Does the Entity have policies, procedures or other	
	controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions	
		Please select
	prohibitions, such as stripping, or the resubmission	Thease select
Ì	and/or masking, of sanctions relevant information in	
	cross border transactions?	
101	Does the Entity screen its customers, including	**************************************
	beneficial ownership information collected by the	
	Entity, during onboarding and regularly thereafter	Please select
	against Sanctions Lists?	
400	_	
102	What is the method used by the Entity for sanctions	Please select
	screening?	
102 a	If 'automated' or 'both automated and manual'	
	selected:	
102 a1	Are internal system of vendor-sourced tools used?	Please select
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what	
	is the name of the vendor/tool?	
102 a2	When did you last test the effectiveness (of finding	
	true matches) and completeness (lack of missing	
	data) of the matching configuration of the	Please select
	automated tool? (If 'Other' please explain in	
	Question 110)	
102	Dood the Entity serven all servetions at 1.1	
103	Does the Entity screen all sanctions relevant data,	
	including at a minimum, entity and location	Please select
	information, contained in cross border transactions	T MUGO GUINOL
	against Sanctions Lists?	
104	What is the method used by the Entity?	Please select
	·	

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

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

129	Does the Entity have real time monitoring to detect fraud?	Please select
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?	Please select
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Please select
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)

BBVA Bank Taiwan Branch
(Financial Institution name) is fully committed to the fight against financial crime and makes
every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

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

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

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

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

I, LIOYMES KAO (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial

(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 horest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution,

8023, 12,14

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

the Wolfsberg Group

Financial Institution Name:
Location (Country):

BBVA S.A., Niederlassung Deutschland
Germany

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 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. ENTIT	TY & OWNERSHIP	
1	Full Legal Name	Banco Bilbao Vizcaya Argentaria S.A.
2	Append a list of foreign branches which are covered by this questionnaire	Banco Bilbao Vizcaya Argentaria S.A., Niederlassung Deutschland
3	Full Legal (Registered) Address	Neue Mainzer Str. 28, 60311 Frankfurt am Main
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	2007
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Please select
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	Please select
6 c	Government or State Owned by 25% or more	Please select
6 d	Privately Owned	Please select
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	Thouse solice.
7	% of the Entity's total shares composed of bearer shares	
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	Please select
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	Please select
10	Name of primary financial regulator/supervisory authority	
11	Provide Legal Entity Identifier (LEI) if available	
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	

13	Jurisdiction of licensing authority and regulator of	
	ultimate parent	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	No
14 b	Private Banking	No
14 c	Commercial Banking	Please select
14 d	Transactional Banking	Please select
14 e	Investment Banking	Please select
14 f	Financial Markets Trading	Please select
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	Please select
14 j	Wealth Management	No
14 k	Other (please explain)	
15	Does the Entity have a significant (10% or more)	
	portfolio of non-resident customers or does it derive	
	more than 10% of its revenue from non-resident	Please select
	customers? (Non-resident means customers primarily resident in a different jurisdiction to the location	riease select
	where bank services are provided)	
	Whole ballk services are provided)	
15 a	If Y, provide the top five countries where the non-	
	resident customers are located.	10 -
16	Select the closest value:	
16 a	Number of employees	1-50
16 b	Total Assets	Please select
17	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches.	Please select
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
40	W	
18	If appropriate, provide any additional information/context to the answers in this section.	
2. PROD	UCTS & SERVICES	
19	Does the Entity offer the following products and	
	services:	
19 a	Correspondent Banking	No
19 a1	IfY	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	Please select
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	Please select
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Please select
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Please select
19 a1e	Does the Entity allow downstream relationships with foreign banks?	Please select
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Please select
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	Please select
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	Please select
19 a1h2	MVTSs	Please select
19 a1h3	PSPs	Please select
		Proposition and the second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second sec

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	Please select
19 b	Cross-Border Bulk Cash Delivery	Please select
19 c	Cross-Border Remittances	No
19 d	Domestic Bulk Cash Delivery	Please select
19 e	Hold Mail	No
19 f	International Cash Letter	No
19 g	Low Price Securities	Please select
19 h	Payable Through Accounts	Please select
19 1	Payment services to non-bank entities who may	Please select
151	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	No
19 k	Remote Deposit Capture (RDC)	Please select
19 I	Sponsoring Private ATMs	Please select
19 m	Stored Value Instruments	No
19 n	Trade Finance	Please select
19 o	Virtual Assets	Please select
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	Please select
19 p2	Wire transfers	No.
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p3	Foreign currency conversion	No No
19 p3a	If yes, state the applicable level of due diligence	Please select
19 p4	Sale of Monetary Instruments	No.
19 p4a	If yes, state the applicable level of due diligence	Please select
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	No
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Banco Bilbao Vizcaya Argentaria S.A., Niederlassung Deutschland
21	If appropriate, provide any additional information/context to the answers in this section.	
	CTF & 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	Please select
22 b	Adverse Information Screening	Please select
22 c	Beneficial Ownership	Please select
22 d	Cash Reporting	Please select
22 e	CDD	Please select
22 f	EDD	Please select
22 g	Independent Testing	Please select
22 h	Periodic Review	
	Periodic Review Policies and Procedures	Please select
221	I FOUCIES AND PROCEDURES	Please select
22 i	7. 24 20 30 30 30 40 40 40 40 40 40 40 40 40 40 40 40 40	
22 j	PEP Screening	Please select
	7. 24 20 30 30 30 40 40 40 40 40 40 40 40 40 40 40 40 40	

22 m	Suspicious Activity Reporting	Please select
22 n	Training and Education	Please select
22 o	Transaction Monitoring	Please select
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	1-10
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Please select
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Please select
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Please select
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Please select
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Banco Bilbao Vizcaya Argentaria S.A., Niederlassung Deutschland
29	If appropriate, provide any additional information/context to the answers in this section.	
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4. ANT	I BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Please select
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Please select
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Please select
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Please select
34	Is the Entity's ABC programme applicable to:	Please select
35	Does the Entity have a global ABC policy that:	1 10000 001001
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Please select
35 b	Includes enhanced requirements regarding interaction with public officials?	Please select
35 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Please select
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Please select
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Please select
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Please select
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Please select
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Please select
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Please select

	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Please select
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Please select
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Please select
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Please select
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Please select
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Please select
42 b	1st Line of Defence	Please select
42 c	2nd Line of Defence	Please select
42 d	3rd Line of Defence	Please select
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Please select
42 f	Non-employed workers as appropriate (contractors/consultants)	Please select
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Please select
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
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.	
	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	The second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second secon	Please select
46 b	Money laundering	Please select
400	Terrorist financing	Please select
46 c	, ,	
2000	Terrorist financing	Please select
46 c	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at	Please select Please select
46 c 47	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and	Please select Please select
46 c 47 48	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?	Please select Please select Please select
46 c 47 48 48 a 48 a 48 a1 48 b	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	Please select Please select Please select Please select
46 c 47 48 48 a 48 a1	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?	Please select Please select Please select Please select Please select
46 c 47 48 48 a 48 a 48 a1 48 b	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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
46 c 47 48 48 a 48 a 48 a 48 b 48 b 49	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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
46 c 47 48 48 a 48 a 48 a 48 b 48 b 49 a	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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 a 49 c	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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
46 c 47 48 48 a 48 a 48 a 48 b 48 b 49 a 49 b	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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d	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 dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d 49 e	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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select

49 i	Define the process for escalating financial crime risk	
	issues/potentially suspicious activity identified by employees	Please select
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Please select
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Please select
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	Please select
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Please select
49 n	Outline the processes for the maintenance of internal "watchlists"	Please select
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Please select
51	Does the Entity have record retention procedures that comply with applicable laws?	Please select
51 a	If Y, what is the retention period?	Please select
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
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.	
C AMI C	TE & CANCTIONS DISK ASSESSMENT	
6. AML, C 54	ETF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
	Does the Entity's AML & CTF EWRA cover the	Please select
54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Please select Please select
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	TO YOU THE CONTRACT
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	Please select
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Please select Please select
54 a 54 b 54 c 54 d 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	Please select Please select Please select Please select
54 a 54 b 54 c 54 d 55 d 55 a 55 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	Please select Please select Please select Please select Please select
54 a 54 b 54 c 54 d 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	Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 b 54 c 54 d 55 d 55 a 55 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	Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 54 c 54 d 55 c 55 a 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	Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 b 54 c 54 d 55 5 a 55 b 55 c 55 d 55 e 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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 554 c 554 d 555 55 a 55 b 55 c 55 d 55 c 55 f 55 g	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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 54 c 54 c 55 d 55 c 55 a 55 b 55 c 55 d 55 e 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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 554 c 554 c 555 a 55 a 55 b 55 c 55 d 55 c 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? If N, provide the date when the last AML & CTF	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 554 c 554 d 55 55 a 555 b 555 c 555 d 55 e 55 f 55 g 55 h 56 56 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.	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 55 c 55 d 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 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.	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 554 c 554 c 554 c 555 c 555 c 555 c 555 c 556 c 556 d 557 c 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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 554 c 554 c 555 c 55 a 55 b 55 c 55 b 55 c 55 d 55 6 55 g 55 h 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 Geography	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 554 c 554 c 555 c 55 a 55 c 55 c 55 d 55 c 55 d 55 f 55 g 55 h 56 a 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. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 554 b 554 c 554 d 55 55 a 555 b 555 c 555 d 55 e 55 f 55 6 56 a 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. 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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 55 b 55 c 55 c 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 57 a 57 c 57 d 58 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:	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 554 c 554 d 55 55 a 555 b 555 c 555 d 555 e 55 f 555 g 555 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? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select

60 CS S 60 a S 61 If ir 7. KYC, CDE 62 C C 64 C 64 a 64 b 64 c 64 d	Does the Entity verify the identity of the customer? 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? Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: Customer identification	Please select Please select Please select Please select Please select Please select Please select Please select
58 g 59 a 159 a 60 C S 60 a 61 If ir 7. KYC, CDE 62 D C 63 D C 64 V re 64 a 64 b 64 c 64 d	Training and Education Has the Entity's Sanctions EWRA been completed in the last 12 months? If N, provide the date when the last Sanctions EWRA was completed. Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. D and EDD Does the Entity verify the identity of the customer? 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? Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: Customer identification	Please select Please select Please select
59 a 59 a 60 C S 60 a 61 If 7. KYC, CDE 62 D 63 D 64 V 76 64 a 64 b 64 c 64 d	Has the Entity's Sanctions EWRA been completed in the last 12 months? If N, provide the date when the last Sanctions EWRA was completed. Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. D and EDD Does the Entity verify the identity of the customer? 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? Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: Customer identification	Please select Please select
60 CS S 60 a	the last 12 months? If N, provide the date when the last Sanctions EWRA was completed. Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. D and EDD Does the Entity verify the identity of the customer? 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? Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: Customer identification	Please select
60 C S S 60 a	Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. D and EDD Does the Entity verify the identity of the customer? 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? Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: Customer identification	Please select
60 a 61 If 7. KYC, CDE 62 D 63 D 64 V 64 a 64 b 64 c 64 d	Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. D and EDD Does the Entity verify the identity of the customer? 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? Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: Customer identification	Please select
60 a 61 If in 7. KYC, CDE 62 D 63 D 64 V 7. 64 a 64 a 64 b 64 c 64 d	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. D and EDD Does the Entity verify the identity of the customer? 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? Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: Customer identification	Side Sides
7. KYC, CDE 62 D 63 C 64 V 64 a 64 b 64 c 64 d	nformation/context to the answers in this section. D and EDD Does the Entity verify the identity of the customer? 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? Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: Customer identification	Side Sides
62 D 63 C 64 W 64 a 64 b 64 c 64 d	Does the Entity verify the identity of the customer? 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? Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: Customer identification	Side Sides
62 D 63 C 64 W 64 a 64 b 64 c 64 d	Does the Entity verify the identity of the customer? 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? Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: Customer identification	Side Sides
63 C C C C C C C C C C C C C C C C C C C	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? Which of the following does the Entity gather and etain when conducting CDD? Select all that apply: Customer identification	Side Sides
64 a 64 b 64 c 64 d	retain when conducting CDD? Select all that apply: Customer identification	
64 b 64 c 64 d	Land Applications of the Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Compa	
64 c 64 d		Please select
64 d	Expected activity	Please select
	Nature of business/employment	Please select
64 e	Ownership structure	Please select
	Product usage	Please select
	Purpose and nature of relationship	Please select
-	Source of funds	Please select
	Source of wealth	Please select
	Are each of the following identified:	
	Ultimate beneficial ownership	Please select
65 a1	Are ultimate beneficial owners verified?	Please select
	Authorised signatories (where applicable)	Please select
	Key controllers	Yes
	Other relevant parties	Please select
a	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	Please select
re	Does the due diligence process result in customers eceiving a risk classification?	Please select
	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Please select
67 a2	Geography	Please select
67 a3	Business Type/Industry	Please select
67 a4	Legal Entity type	Please select
67 a5	Adverse Information	Please select
67 a6	Other (specify)	
pa	or high risk non-individual customers, is a site visit a part of your KYC process?	Please select
	If Y, is this at:	
68 a1	Onboarding	Please select
68 a2	KYC renewal	Please select
68 a3	Trigger event	Please select
68 a4 68 a4a	Other If yes, please specify "Other"	Please select
SC N	Does the Entity have a risk based approach to creening customers for Adverse Media/Negative lews?	Please select
69 a 69 a1	If Y, is this at:	No. of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of the last of
69 a1	Onboarding KYC renewal	Please select Please select

69 a3	Trigger event	Please select
70	What is the method used by the Entity to screen for	
	Adverse Media/Negative News?	Please select
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?	Please select
71 a	If Y, is this at:	
71 a1	Onboarding	Please select
71 a2	KYC renewal	Please select
71 a3	Trigger event	Please select
72 73	What is the method used by the Entity to screen PEPs?	Please select
/3	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?	Please select
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Please select
74 a	If yes, select all that apply:	
74 a1	Less than one year	Please select
74 a2	1 – 2 years	Please select
74 a3	3 – 4 years	Please select
74 a4	5 years or more	Please select
74 a5 74 a6	Trigger-based or perpetual monitoring reviews	Please select
74 80	Other (Please specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Please select
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	Please select
76 b	Respondent Banks	Please select
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Please select
76 c	Embassies/Consulates	Please select
76 d	Extractive industries	Please select
76 e	Gambling customers	Please select
76 f	General Trading Companies	Please select
76 g	Marijuana-related Entities	Please select
76 h		Please select
76 i	44	Please select
76 j		Please select
76 k		Please select
76 I	The same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the sa	
76 m		Please select Please select
76 n		NC511
76 o		Please select
The second second		Please select
76 p		Please select
76 q		Please select
76 r		Please select
76 s		Please select
76 t		Please select
76 u		Please select
76 v		Please select
76 w		Please select
76 x	Virtual Asset Service Providers	Please select
76 y	Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	Please select

78 a	If Y indicate who provides the approval:	Please select
79	Does the Entity have specific procedures for	1,000 0,000
	onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Please select
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Please select
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	Banco Bilbao Vizcaya Argentaria S.A., Niederlassung Deutschland
82	If appropriate, provide any additional information/context to the answers in this section.	Local procedure applicable as required
8. MONI	TORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Please select
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Please select
84 a	If manual or combination selected, specify what type of transactions are monitored manually	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Please select
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	
84 b2	When was the tool last updated?	Please select
84 b3	When was the automated Transaction Monitoring application last calibrated?	Please select
85	Does the Entity have regulatory requirements to report suspicious transactions?	Please select
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Please select
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Please select
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Please select
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Please select
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Please select
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	
DAVIS	ENT TRANSPARENCY	
9. PATIVII	Does the Entity adhere to the Wolfsberg Group	
	Payment Transparency Standards?	Please select

0.2	Door the Felikuban - II-l-	
93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Please select
93 b	Local Regulations	Please select
93 b1	If Y, specify the regulation	T lease select
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Please select
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Please select
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Please select
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANO	CTIONS	
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?	Please select
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Please select
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Please select
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Please select
102	What is the method used by the Entity for sanctions screening?	Please select
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Please select
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	Please select
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions	Please select
	against Sanctions Lists?	

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Please select
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Please select
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Please select
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Please select
106 d	European Union Consolidated List (EU)	Please select
106 e	Lists maintained by other G7 member countries	Please select
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	Please select
107 b	Transactions	Please select
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	No
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Banco Bilbao Vizcaya Argentaria S.A., Niederlassung Deutschland
110	If appropriate, provide any additional information/context to the answers in this section.	
11, TRAIN	ING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Please select
111 Ь	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Please select
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Please select
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Please select
111 e	Conduct and Culture	Please select
111 f	Fraud	Please select
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	Please select
112 b	1st Line of Defence	Please select
112 c	2nd Line of Defence	Please select
112 d	3rd Line of Defence	Please select
112 e	Third parties to which specific FCC activities have been outsourced	Please select
112 f	Non-employed workers (contractors/consultants)	Please select
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Please select
114 a	If Y, how frequently is training delivered?	Please select
115	Confirm that all responses provided in the above	
000	Section are representative of all the LE's branches	Please select

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

	Does the Entity have real time monitoring to detect fraud?	Please select
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?	Please select
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Please select
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	roup Coπespondent Banking Due Diligence Questionnaire 2023 (CE Statement (To be signed by Global Head of Correspondent Bank Laundering, Chief Compliance Officer, Global Head of Financial	ring or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of
BBVA S.A	, Niederlassung Deutschland (Financial Instituti	on name) is fully committed to the fight against financial crime and makes
	(i ilialiciai ilialitati	on name) is fully committed to the fight against financial crime and makes s, regulations and standards in all of the jurisdictions in which it does business and holds accounts.
every effort	to remain in full compliance with all applicable financial crime laws	
every effort The Financ legal and re The Financ	to remain in full compliance with all applicable financial crime laws al Institution understands the critical importance of having effection gulatory obligations.	s, regulations and standards in all of the jurisdictions in which it does business and holds accounts.
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every effort The Finance legal and re The Finance standards. The Finance The Finance The Finance The Finance The Finance The Finance The All the Answers	to remain in full compliance with all applicable financial crime laws all Institution understands the critical importance of having effecting gulatory obligations. all Institution recognises the importance of transparency regarding all Institution further certifies it complies with / is working to complition provided in this Wolfsberg CBDDQ will be kept current and wall Institution commits to file accurate supplemental information on (Global Head o	s, regulations and standards in all of the jurisdictions in which it does business and holds accounts. We and sustainable controls to combat financial crime in order to protect its reputation and to meet its g parties to transactions in international payments and has adopted/is committed to adopting these y with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. It be updated no less frequently than every eighteen months.
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every effort The Financ legal and re The Financ standards. The Financ The informa The Financ I, N/A the answers Institution. I, Marek I Wolfsberg C	to remain in full compliance with all applicable financial crime laws all Institution understands the critical importance of having effecting gulatory obligations. all Institution recognises the importance of transparency regarding all Institution further certifies it complies with / is working to complition provided in this Wolfsberg CBDDQ will be kept current and wall Institution commits to file accurate supplemental information on (Global Head of provided in this Wolfsberg CBDDQ are complete and correct to (Glian, Head of Compliance & AML Germany (MLRO or equited) (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature & Date (Signature &	s, regulations and standards in all of the jurisdictions in which it does business and holds accounts. We and sustainable controls to combat financial crime in order to protect its reputation and to meet its g parties to transactions in international payments and has adopted/is committed to adopting these with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. Will be updated no less frequently than every eighteen months. a timely basis. If Correspondent Banking or equivalent), certify that I have read and understood this declaration, that my honest belief, and that I am authorised to execute this declaration on behalf of the Financial evalent), certify that I have read and understood this declaration, that the answers provided in this m authorised to execute this declaration on behalf of the Financial Institution.
every effort The Financ legal and re The Financ standards. The Financ The informa The Financ I, N/A the answer: Institution. I, Marek I Wolfsberg C	to remain in full compliance with all applicable financial crime laws all Institution understands the critical importance of having effecting gulatory obligations. all Institution recognises the importance of transparency regarding all Institution further certifies it complies with / is working to complition provided in this Wolfsberg CBDDQ will be kept current and we all Institution commits to file accurate supplemental information on (Global Head of provided in this Wolfsberg CBDDQ are complete and correct to Gilian, Head of Compliance & AML Germany (MLRO or equition of the complete and correct to my honest belief, and that I also the complete and correct to my honest belief, and that I also the complete and correct to my honest belief, and that I also the complete and correct to my honest belief, and that I also the complete and correct to my honest belief.	s, regulations and standards in all of the jurisdictions in which it does business and holds accounts. We and sustainable controls to combat financial crime in order to protect its reputation and to meet its g parties to transactions in international payments and has adopted/is committed to adopting these with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. Will be updated no less frequently than every eighteen months. a timely basis. If Correspondent Banking or equivalent), certify that I have read and understood this declaration, that my honest belief, and that I am authorised to execute this declaration on behalf of the Financial evalent), certify that I have read and understood this declaration, that the answers provided in this m authorised to execute this declaration on behalf of the Financial Institution.



Financial Institution Name:	
Location (Country) :	

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	
2	Append a list of foreign branches which are covered	
	by this questionnaire	
3	Full Legal (Registered) Address	
	an Logar (regionarou) / nauross	
4	Full Primary Business Address (if different from	
4	above)	
	above)	
5	Date of Entity incorporation/establishment	
6	Select type of ownership and append an ownership	
	chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	
6 b	Member Owned/Mutual	
6 c	Government or State Owned by 25% or more	
6 d	Privately Owned	
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer	
	shares	
8	Does the Entity, or any of its branches, operate under	
	an Offshore Banking License (OBL)?	
8 a	If Y, provide the name of the relevant branch/es	
o a	which operate under an OBL	
	million operate and all object	
0	Does the Bank have a Virtual Bank License or	
9	provide services only through online channels?	
40		
10	Name of primary financial regulator/supervisory authority	
	authority	
11	Provide Legal Entity Identifier (LEI) if available	
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	
	1	l .

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

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	
19 c	Cross-Border Remittances	
19 d	Domestic Bulk Cash Delivery	
19 e	Hold Mail	
19 f	International Cash Letter	
19 g	Low Price Securities	
19 h	Payable Through Accounts	
19 i	Payment services to non-bank entities who may	
	then offer third party payment services to their customers?	
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	
19 j	Private Banking	
19 k	Remote Deposit Capture (RDC)	
19 I	Sponsoring Private ATMs	
19 m	Stored Value Instruments	
19 n	Trade Finance	
19 o	Virtual Assets	
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	
19 p4a 19 p5	If yes, state the applicable level of due diligence If you offer other services to walk-in customers	
19 þ5	please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	
3. AML, C	TF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum	
	AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	
22 b	Adverse Information Screening	
22 c	Beneficial Ownership	
22 d	Cash Reporting	
22 e	CDD	
22 f	EDD	
22 g	Independent Testing	
22 h	Periodic Review	
22 i	Policies and Procedures	
22 j	PEP Screening	
22 k	Risk Assessment	
22 I	Sanctions	

27 Taming and Excellent 28 How many full sine employees are in the Entity's MAL, CTF & Sanctions Deployees are in the Entity's AMA, CTF & Sanctions Deployees are in the Entity's AMA, CTF & Sanctions Deployees are in the Entity's AMA, CTF & Sanctions Deploy approved attested annually by the Book or equivalent Review of the CTF & Sanctions Deploy approved attested annually by the Book or equivalent Review or experience in Cuestion 29. 28 Dees the Sourd receive, seases, and challenge purposes or experience or consideration of the CTF & Sanctions programme? 29 Dees the Entity was the parties to curry out anny components of the Entity and the CTF & Sanctions programme? 20 Dees the Entity was a whistleblower policity? 20 Dees the Entity was a whistleblower policity? 21 Dees the anny have a whistleblower policity? 22 Dees the Entity was a whistleblower policity? 23 Dees the anny have a whistleblower policity? 24 Dees the Entity was a whistleblower policity? 25 Dees the Entity was a whistleblower policity? 26 Dees the Entity was a whistleblower policity? 27 Dees the anny have a whistleblower policity? 28 Dees the Entity was a whistleblower policity? 29 If appropriate, provide any additional information to the Entity that the Entity documents of policies to a fine the Entity that the Entity documents of policies and procedures consistent with a policies bed Script and the Entity that the Entity documents of policies and procedures consistent with a policies bed Script and the Entity that the Entity documents to insacrably prevent, docted and report theory and completion? 29 This is the Entity that the Entity documents and procedures consistent with applicable Script and the Entity that the Entity documents of policies and procedures consistent with applicable Script and the Entity that the Entity and Completion or receiving of anything of value, directly or indirectly. If impropriety indirected to the ABC programme? 30 Dees the Entity thave an entity that the Entitle Control or indirectly. If impropriety	22 m	Suspicious Activity Reporting	
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components detailed below: 40 a Potential liability created by intermediaries and		is the net result of the controls effectiveness and the inherent risk assessment?	
		components detailed below:	
	40 a		

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	
40 с	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	
40 e	Changes in business activities that may materially increase the Entity's corruption risk	
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	
42 b	1st Line of Defence	
42 c	2nd Line of Defence	
42 d	3rd Line of Defence	
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	
42 f	Non-employed workers as appropriate (contractors/consultants)	
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
5. AML, C	TF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	
46 b	Terrorist financing	
46 c	Sanctions violations	
47	Are the Entity's policies and procedures updated at least annually?	
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	
48 b1	If Y, does the Entity retain a record of the results?	
48 b1 49	If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that:	
48 b1	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	
48 b1 49	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	
48 b1 49 49 a	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	
48 b1 49 49 a 49 b	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	
48 b1 49 49 a 49 b 49 c 49 d	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	
48 b1 49 49 a 49 b 49 c 49 d 49 e	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	
48 b1 49 49 a 49 b 49 c 49 d 49 e	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 NBFls Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities	
48 b1 49 49 a 49 b 49 c 49 d 49 e	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 NBFls Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for	

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

58 e	Name Screening	
58 f	Transaction Screening	
58 g	Training and Education	
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	
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	
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?	
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?	
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	
64 b	Expected activity	
64 c	Nature of business/employment	
64 d	Ownership structure	
64 e	Product usage	
64 f	Purpose and nature of relationship	
64 g	Source of funds	
64 h	Source of wealth	
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	
65 a1	Are ultimate beneficial owners verified?	
65 b		
	Authorised signatories (where applicable)	
65 c	Key controllers	
65 d	Other relevant parties	
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	
67	Does the due diligence process result in customers receiving a risk classification?	
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	
67 a2	Geography	
67 a3	Business Type/Industry	
67 a4	Legal Entity type	
67 a5	Adverse Information	
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	
68 a	If Y, is this at:	
68 a1	Onboarding	
68 a2	KYC renewal	
68 a3	Trigger event	
68 a4	Other	
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	
69 a	If Y, is this at:	
69 a1	Onboarding	
69 a2	KYC renewal	

69 a3	Trigger event	
69 a3 70	Trigger event	
	What is the method used by the Entity to screen for Adverse Media/Negative News?	
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
71 a	If Y, is this at:	
71 a1	Onboarding	
71 a2	KYC renewal	
71 a3	Trigger event	
72	What is the method used by the Entity to screen PEPs?	
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	
74 a	If yes, select all that apply:	
74 a1	Less than one year	
74 a2	1 – 2 years	
74 a3	3 – 4 years	
74 a4 74 a5	5 years or more Trigger-based or perpetual monitoring reviews	
74 a5 74 a6	Other (Please specify)	
7440	Outer (Frease specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	
76 b	Respondent Banks	
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	
76 d	Extractive industries	
76 e	Gambling customers	
76 f	General Trading Companies	
76 g	Marijuana-related Entities	
76 h	MSB/MVTS customers	
76 i	Non-account customers	
76 j	Non-Government Organisations	
76 k	Non-resident customers	
76 I	Nuclear power	
76 m	Payment Service Providers	
76 n	PEPs	
76 o	PEP Close Associates	
76 p	PEP Related	
76 q	Precious metals and stones	
76 r	Red light businesses/Adult entertainment	
76 s	Regulated charities	
76 t	Shell banks	
76 u	Travel and Tour Companies	
76 v	Unregulated charities	
76 w	Used Car Dealers	
76 x 76 y	Virtual Asset Service Providers Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	

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

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
00 -	'	
93 a	FATF Recommendation 16	
93 b	Local Regulations	
93 b1	If Y, specify the regulation	
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC	TIONS	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	
102	What is the method used by the Entity for sanctions screening?	
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	
104	What is the method used by the Entity?	

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

115 а	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
12. QUALI	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based	
	Quality Assurance programme for financial crime (separate from the independent Audit function)?	
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
13. AUDIT		
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	
122 b	External Third Party	
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	
123 b	Enterprise Wide Risk Assessment	
123 c 123 d	Governance KYC/CDD/EDD and underlying methodologies	
123 u	Name Screening & List Management	
123 f	Reporting/Metrics & Management Information	
123 g	Suspicious Activity Filing	
123 h	Technology	
123 i	Transaction Monitoring	
123 j	Transaction Screening including for sanctions	
123 k 123 l	Training & Education Other (specify)	
1231	Outer (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	
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. FRAU	סנ	
127	Does the Entity have policies in place addressing fraud risk?	
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	
	•	

Does the Entity have real time monitoring to detect fraud?	
Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	
Confirm that all responses provided in the above section are representative of all the LE's branches	
If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
If appropriate, provide any additional information/context to the answers in this section.	
n Statement	
up Correspondent Banking Due Diligence Questionnaire 2023 (CE atement (To be signed by Global Head of Correspondent Bank aundering, Chief Compliance Officer, Global Head of Financial	ring or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of
	ion name) is fully committed to the fight against financial crime and makes s, regulations and standards in all of the jurisdictions in which it does business and holds accounts.
Institution understands the critical importance of having effective latory obligations.	ve and sustainable controls to combat financial crime in order to protect its reputation and to meet its
Institution recognises the importance of transparency regardin	g parties to transactions in international payments and has adopted/is committed to adopting these
Institution further certifies it complies with / is working to compl n provided in this Wolfsberg CBDDQ will be kept current and v	y with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. vill be updated no less frequently than every eighteen months.
Institution commits to file accurate supplemental information or	a timely basis.
	of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that my honest belief, and that I am authorised to execute this declaration on behalf of the Financial
	ivalent), certify that I have read and understood this declaration, that the answers provided in this am authorised to execute this declaration on behalf of the Financial Institution.
(Signature & Dat	e)
(Signature & Dat	e)
	fraud? Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information of Correspondent Bankaundering, Chief Compliance Officer, Global Head of Financial Institution remain in full compliance with all applicable financial crime laws institution understands the critical importance of having effectivatory obligations. Institution further certifies it complies with / is working to compliant provided in this Wolfsberg CBDDQ will be kept current and valuation commits to file accurate supplemental information or (Global Head of crovided in this Wolfsberg CBDDQ are complete and correct to (MLRO or equication) (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Signature & Data (Sign

the Wolfsberg Group

Financial Institution Name:
Location (Country):

Banco Bilbao Vizcaya Argentaria, S.A. Shanghai Branch
China

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.

ENTIT	Y & OWNERSHIP	
	Full Legal Name	Banco Bilbao Vizcaya Argentaria, S.A. Shanghai Branch
2	Append a list of foreign branches which are covered by this questionnaire	BBVA Shanghai Branch
3	Full Legal (Registered) Address	4501,08 Jin Mao Tower,88 Century Boulevard, Shanghai 200121, China
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	16 Nov,2015
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Please select
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	Please select
6 c	Government or State Owned by 25% or more	Please select
6 d	Privately Owned	Please select
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	Please select
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	Please select
10	Name of primary financial regulator/supervisory authority	National Administration of Financial Regulation People's Bank of China
11	Provide Legal Entity Identifier (LEI) if available	300300C1321131000022
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	

Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate parent Illimate p			
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14 c Commercial Banking Please select			
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14 Investment Banking No			
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14		Investment Banking	No
14	14 f	Financial Markets Trading	Please select
Multilateral Development Bank Please select	14 g	Securities Services/Custody	No
Multilateral Development Bank Please select	14 h	Broker/Dealer	Please select
14 Wealth Management	14 i	Multilateral Development Bank	
Dees the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers or young than 10% of its revenue from non-resident customers or young than 10% of its revenue from non-resident customers or young than 10% of its revenue from non-resident customers or young than 10% of its revenue from non-resident customers or young than 10% of its revenue from non-resident customers or provided where bank services are provided. 15 a If Y, provide the top five countries where the non-resident customers are located. 16 a Number of employees 1.5-90 16 b Tost Assets 2.5-90 17 a Confirm that all responses provided in the above Section are representative of all the LEs branches. 17 a If N, clarify which questions the difference's relate to and the branchies that this applies to. 18 If appropriate, provide any additional information/context to the answers in this section. 19 a Correspondent Banking 19 a Correspondent Banking services to domestic banks? 19 a Correspondent Banking 19 at 19 at 19 and 19 at 19 at 19 at 19 and 19 at 19 and 19 at 19 and 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19 at 19			
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19 a1i	Does the Entity have processes and procedures	
	in place to identify downstream relationships with MSBs /MVTSs/PSPs?	Please select
	<u> </u>	
19 b	Cross-Border Bulk Cash Delivery	Please select
19 c	Cross-Border Remittances	Please select
19 d	Domestic Bulk Cash Delivery	Please select
19 e	Hold Mail	No
19 f	International Cash Letter	No
19 g	Low Price Securities	Please select
19 h	Payable Through Accounts	Please select
19 i	Payment services to non-bank entities who may 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	No
19 k	Remote Deposit Capture (RDC)	Please select
19 1	Sponsoring Private ATMs Stored Value Instruments	Please select
19 m		No
19 n	Trade Finance Virtual Assets	Please select
19 o	For each of the following please state whether you	Please select
19 p	offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	Please select
19 p2	Wire transfers	Please select
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p3	Foreign currency conversion	Please select
19 p3a	If yes, state the applicable level of due diligence	Please select
19 p3a 19 p4	Sale of Monetary Instruments	Please select
19 p3a 19 p4 19 p4a	Sale of Monetary Instruments If yes, state the applicable level of due diligence	
19 p3a 19 p4	Sale of Monetary Instruments	Please select
19 p3a 19 p4 19 p4a	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including	Please select Please select
19 p3a 19 p4 19 p4a 19 p5	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by	Please select Please select
19 p3a 19 p4 19 p4a 19 p5 19 p5	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above	Please select Please select No.
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19 p3a 19 p4 19 p4 19 p4a 19 p5 19 q 20 a	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Please select Please select No.
19 p3a 19 p4 19 p4 19 p4a 19 p5 19 q 20 a 21	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Please select No. Please select
19 p3a 19 p4 19 p4 19 p4a 19 p5 19 q 20 a	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Please select No. Please select
19 p3a 19 p4 19 p4a 19 p5 19 p5 20 20 a 21 3. AML, C	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise	Please select No. Please select
19 p3a 19 p4 19 p4a 19 p5 19 p5 20 20 a 21 3. AML, C	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening	Please select No. Please select Please select Please select Please select Please select
19 p3a 19 p4 19 p4 19 p4a 19 p5 19 q 20 a 21 a 21 a 22 a 22 b 22 c	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership	Please select No. Please select
19 p3a 19 p4 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting	Please select No. Please select Please select Please select Please select Please select Please select
19 p3a 19 p4 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3, AML, C 22 22 a 22 b 22 c 22 d 22 e	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting	Please select No. Please select
19 p3a 19 p4 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD	Please select No. Please select
19 p3a 19 p4 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C 22 22 b 22 c 22 c 22 c 22 g	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Please select No. Please select
19 p3a 19 p4 19 p4 19 p4a 19 p5 20 20 a 21 22 a 22 b 22 c 22 d 22 c 22 g 22 h	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review	Please select No. Please select
19 p3a 19 p4 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C 22 22 b 22 c 22 c 22 c 22 g	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Please select No. Please select
19 p3a 19 p4 19 p4 19 p4a 19 p5 20 20 a 21 22 a 22 b 22 c 22 d 22 c 22 g 22 h	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review	Please select No. Please select
19 p3a 19 p4 19 p4 19 p4a 19 p5 19 q 20 a 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 i	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Please select No. Please select
19 p3a 19 p4 19 p4 19 p4a 19 p5 19 q 20 a 20 a 21 a 22 a 22 b 22 c 22 d 22 c 22 f 22 g 22 h 22 i 22 j	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Please select Please select No. Please select

22 m	Suspicious Activity Reporting	Please select
22 n	Training and Education	Please select
22 0	Transaction Monitoring	Please select
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	1-10
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Yes
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Please select
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Please select
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Please select
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	
4. ANTI	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Please select
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Please select
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Please select
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Please select
34	Is the Entity's ABC programme applicable to:	Please select
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Please select
35 b	Includes enhanced requirements regarding interaction with public officials?	Please select
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Please select
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Please select
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Please select
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Please select
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Please select
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Please select
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Please select

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

49 i		
	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Please select
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Please select
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Please select
49 1	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	Please select
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	s Please select
49 n	Outline the processes for the maintenance of internal "watchlists"	Please select
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Please select
51	Does the Entity have record retention procedures that comply with applicable laws?	Please select
51 a	If Y, what is the retention period?	Please select
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context to the answers in this section.	
6 AMI CI	FF & SANCTIONS RISK ASSESSMENT	A SAN THE STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET STREET
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 a	Client	Please select
54 b	Product	Please select
54 c	Channel	·
54 d		Please select
	Geography	Please select Please select
55	Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Please select Please select
	Does the Entity's AML & CTF EWRA cover the	Please select
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Please select Please select
55 55 a	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Please select
55 a 55 b	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Please select Please select Please select
55 a 55 b 55 c	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Please select Please select Please select Please select
55 a 55 b 55 c 55 d	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	Please select Please select Please select Please select Please select
55 a 55 b 55 c 55 d 55 e	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	Please select Please select Please select Please select Please select Please select
55 a 55 b 55 c 55 d 55 e	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	Please select Please select Please select Please select Please select Please select Please select
55 a 55 b 55 c 55 d 55 e 55 f 55 g	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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
55 a 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
55 a 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
55 a 55 b 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 h 56 a	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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
55 a 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 56 a 57	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:	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
55 a 55 a 55 b 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 a	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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
55 a 55 a 55 b 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57	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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
55 a 55 a 55 b 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 57 a 57 b 57 c	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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
55 a 55 b 55 c 55 d 55 b 55 c 55 d 55 d 55 d	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:	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
55 a 55 a 55 b 55 c 55 d 55 b 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 5	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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
55 a 55 a 55 b 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 57 a 57 a 57 c 57 d 58	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select

58 e	Name Screening	Please select
58 f	Transaction Screening	Please select
58 g	Training and Education	Please select
50 g 59	Has the Entity's Sanctions EWRA been completed in	1 10000 001001
	the last 12 months?	Please select
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	Please select
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.	
	DD and EDD	
62	Does the Entity verify the identity of the customer?	Please select
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?	Please select
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Please select
64 b	Expected activity	Please select
64 c	Nature of business/employment	Please select
64 d	Ownership structure	Please select
64 e	Product usage	Please select
64 f	Purpose and nature of relationship	Please select
64 g	Source of funds	Please select
64 h	Source of wealth	Please select
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Please select
65 a1	Are ultimate beneficial owners verified?	Please select
65 b	Authorised signatories (where applicable)	Please select
65 c	Key controllers	Please select
65 d	Other relevant parties	Please select
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	Please select
67	Does the due diligence process result in customers receiving a risk classification?	Please select
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Please select
67 a2	Geography	Please select
67 a3	Business Type/Industry	Please select
67 a4	Legal Entity type	Please select
67 a5	Adverse Information	Please select
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Please select
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 68 a4a	Other If yes, please specify "Other"	Please select
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Please select
69 a	If Y, is this at:	CONTROL OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE
69 a1	Onboarding	Please select
69 a2	KYC renewal	Please select

69 a3	Trigger event	Diago coloct
70	What is the method used by the Entity to screen for	Please select
	Adverse Media/Negative News?	Please select
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?	Please select
71 a	If Y, is this at:	
71 a1	Onboarding	Please select
71 a2	KYC renewal	Please select
71 a3 72	Trigger event	Please select Please select
73	What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes to review and escalate potential matches from screening	Please select
74	customers and connected parties to determine whether they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk	
74 a	rating (Periodic Reviews)?	Please select
74 a1	If yes, select all that apply: Less than one year	Yes
74 a2	1 – 2 years	Please select
74 a3	3 – 4 years	Please select
74 a4	5 years or more	Please select
74 a5	Trigger-based or perpetual monitoring reviews	Please select
74 a6	Other (Please specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Please select
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	Please select
76 b	Respondent Banks	Please select
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Please select
76 c	Embassies/Consulates	Please select
76 d	Extractive industries	Please select
76 e	Gambling customers	Please select
76 f	General Trading Companies	Please select
76 g	Marijuana-related Entities	Please select
76 h	MSB/MVTS customers	Please select
76 i	Non-account customers	Please select
76 j	Non-Government Organisations	Please select
76 k	Non-resident customers	Please select
76 I	Nuclear power	Please select
76 m	Payment Service Providers	Please select
76 n	PEPs	Please select
76 o	PEP Close Associates	Please select
76 p	PEP Related	Please select
76 q	Precious metals and stones	Please select
76 r	Red light businesses/Adult entertainment	Please select
76 s	Regulated charities	Please select
76 t	Shell banks	Please select
76 u	Travel and Tour Companies	Please select
76 v	Unregulated charities	Please select
76 w	Used Car Dealers	Please select
76 x	Virtual Asset Service Providers	Please select
76 y	Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/	

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

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Please select
93 b	Local Regulations	Please select
93 b1	If Y, specify the regulation	PRC AML LAW
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Please select
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Please select
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Please select
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC	TIONS	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Please select
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Please select
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Please select
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Please select
102	What is the method used by the Entity for sanctions screening?	Please select
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Please select
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	Please select
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Please select
104	What is the method used by the Entity?	Please select

105	Does the Entity have a data quality management	
	programme to ensure that complete data for all	Please select
	transactions are subject to sanctions screening?	
106	Select the Sanctions Lists used by the Entity in its	
	sanctions screening processes:	
106 a	Consolidated United Nations Security Council	Please select
	Sanctions List (UN)	
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Please select
400 -	Office of Financial Sanctions Implementation HMT	
106 c	(OFSI)	Please select
106 d	European Union Consolidated List (EU)	Please select
106 a	Lists maintained by other G7 member countries	Please select
106 f	Other (specify)	110000 00100
	(,/	
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	Please select
107 b	Transactions	Please select
108	Does the Entity have a physical presence, e.g.	
	branches, subsidiaries, or representative offices	
	located in countries/regions against which UN, OFAC,	Please select
	OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	
400		
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
109 a	If N, clarify which questions the difference/s relate to	
109 a	and the branch/es that this applies to.	
	and the trainer and approve to	
110	If appropriate, provide any additional	
''"	information/context to the answers in this section.	
11. TRAIN	ING & EDUCATION	
111	Does the Entity provide mandatory training, which	
	includes:	
111 a	Identification and reporting of transactions to	Please select
	government authorities	Please select
111 b	Examples of different forms of money laundering,	
	terrorist financing and sanctions violations relevant	l Please select
	for the types of products and services offered	11000 00100
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Please select
111 d		
111 a	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Please select
111 e	Conduct and Culture	Please select
111 f	Fraud	Please select
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	Please select
112 b	1st Line of Defence	Please select
112 c	2nd Line of Defence	Please select
112 d	3rd Line of Defence	Please select
112 e	Third parties to which specific FCC activities have	Please select
	been outsourced	1 10430 30100
112 f	Non-employed workers (contractors/consultants)	Please select
113	Does the Entity provide AML, CTF & Sanctions training	1
	that is targeted to specific roles, responsibilities and	Please select
114	high-risk products, services and activities? Does the Entity provide customised training for AML,	
114	CTF and Sanctions staff?	Please select
114 a	If Y, how frequently is training delivered?	Please select
115	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches	Please select
	Occupit are representative of all the LL's praffiches	

115 а	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
12 OHALID	/ ASSURANCE /COMPLIANCE TESTING	
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	THE RESERVE OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE	
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)?	Please select
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Please select
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
119 а	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
42 AUDIT		
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 party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Please select
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Please select
122 b	External Third Party	Please select
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Please select
123 b	Enterprise Wide Risk Assessment	Please select
123 c	Governance	Please select
123 d	KYC/CDD/EDD and underlying methodologies	Please select
123 e	Name Screening & List Management	Please select
123 f	Reporting/Metrics & Management Information	Please select
123 g	Suspicious Activity Filing	Please select
123 h	Technology	Please select
123 i	Transaction Monitoring	Please select
123 j	Transaction Screening including for sanctions	Please select
123 k	Training & Education	Please select
123	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Please select
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Please select
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. FRAU		
127	Does the Entity have policies in place addressing fraud risk?	Please select
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Please select
·		<u> </u>

129	Does the Entity have real time monitoring to detect fraud?	Please select		
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?	Please select		
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Please select		
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.			
Wolfsberg G	ion Statement Froup Correspondent Banking Due Diligence Questionnaire 2023 (CR Statement (To be signed by Global Head of Correspondent Bank	king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of		
	/ Laundering, Chief Compliance Officer, Global Head of Financial			
	BANCO BILBAO VIZCAYA ARGENTARIA S.A Shanghei (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.			
	ial Institution understands the critical importance of having effecti gulatory obligations.	ve and sustainable controls to combat financial crime in order to protect its reputation and to meet its		
The Financ standards.	ial Institution recognises the importance of transparency regarding	ng parties to transactions in international payments and has adopted/is committed to adopting these		
	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 Financ	ial Institution commits to file accurate supplemental information or	n a timely basis.		
I, the answer Institution.		of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that only honest belief, and that I am authorised to execute this declaration on behalf of the Financial		
	Wenjie He (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Volfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.			
	(Signature & Da	te)		
W	Warre & Date)			



the Wolfsberg Group

Financial Institution Name: Location (Country) :

BBVA SA, NEW YORK BRANCH 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.

	rent than its Entity Head Office, a separate questionnaire can be completed	
No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	
		BANCO BILBAO VIZCAYA ARGENTARIA S.A.
2	Append a list of foreign branches which are covered by	
-	this questionnaire	
	and quodisimans	BANCO BILBAO VIZCAYA ARGENTARIA S.A., NEW YORK BRANCH
3	Full Legal (Registered) Address	
		1345 Avenue of the Americas, 44th Floor, New York, NY 10105, United States of America
4	Full Drivery Dunings Address (if different from the co.)	
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	
	, , , , , , , , , , , , , , , , , , , ,	
		Licensed on Sept 17, 1990.
6	Select type of ownership and append an ownership chart	
	if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	
		BBVA:SM
		Madrid, Barcelona, Bilbao, Valencia, London, Mexico, New York.
6 b	Member Owned/Mutual	No
6 C	Government or State Owned by 25% or more	No No
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate beneficial	
• • •	owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
		L
		0%
8	Does the Entity, or any of its branches, operate under an	
9	Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which	
	operate under an OBL	
	·	
9	Does the Bank have a Virtual Bank License or provide	no
40	services only through online channels?	
10	Name of primary financial regulator/supervisory authority	
		New York State Department of Financial Services (NYDFS), and
		Federal Reserve Bank
11	Provide Legal Entity Identifier (LEI) if available	
	Land Land Control (LLI) il didinatio	
		K8MS7FD7N5Z2WQ51AZ71

12		
14	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	
	different from the Entity completing the DDQ)	None
		None
13	Jurisdiction of licensing authority and regulator of	
	ultimate parent	
	ultimate parent	ODAIN.
		SPAIN
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	No
14 b	Private Banking	No .
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
	Securities Services/Custody	No
14 g		
14 h	Broker/Dealer	No .
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	
	· · · · · · · · · · · · · · · · ·	
15	Does the Entity have a significant (10% or more) portfolio	
	of non-resident customers or does it derive more than	
	10% of its revenue from non-resident customers? (Non-	
	resident means customers primarily resident in a	Yes
	different jurisdiction to the location where bank services	
	are provided)	
15 a	If Y, provide the top five countries where the non-resident	1. Peru
	customers are located.	2. Colombia
		3. Argentina
		4. Bermuda
		5. Mexico
16	Select the closest value:	
16 a	Number of employees	51-200
16 b	Total Assets	Greater than \$500 million
17		Greater than 4500 million
17	Confirm that all responses provided in the above Section	No
	are representative of all the LE's branches.	
17 a	If N, clarify which questions the difference/s relate to and	
17 u	the branch/es that this applies to.	
	the branchies that this applies to.	Out DDIA Dur Different for the Health and the ADDIA O. A
		See BBVA Due Diligence for global branches of BBVA S.A.
18	If appropriate, provide any additional information/context	
	to the answers in this section.	
2. PRODU	JCTS & SERVICES	
19	Does the Entity offer the following products and services:	Vas
19 19 a	Does the Entity offer the following products and services: Correspondent Banking	Yes
19 19 a 19 a1	Does the Entity offer the following products and services: Correspondent Banking If Y	Yes
19 19 a	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to	
19 19 a 19 a1 19 a1a	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks?	Yes No
19 19 a 19 a1	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to	No
19 19 a 19 a1 19 a1a	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	
19 19 a 19 a1 19 a1a 19 a1b	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?	No
19 19 a 19 a1 19 a1a	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	No No
19 19 a 19 a1 19 a1a 19 a1b	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	No
19 19 a 19 a1 19 a1a 19 a1b	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?	No No
19 19 a 19 a1 19 a1a 19 a1b	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	No No Yes
19 19 a 19 a1 19 a1a 19 a1b	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?	No No
19 19 a 19 a1 19 a1a 19 a1b 19 a1c	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?	No No Yes Yes
19 19 a 19 a1 19 a1a 19 a1b	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	No No Yes
19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e	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?	No No Yes Yes No
19 19 a 19 a1 19 a1a 19 a1b 19 a1c	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks?	No No Yes Yes
19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f	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?	No No Yes Yes No
19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e	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?	No No Yes Yes No
19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f	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?	No No Yes Yes No Yes
19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f	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 fore Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money	No No Yes Yes No
19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f	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?	No No Yes Yes No Yes
19	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	No No Yes Yes No Yes
19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	No No Yes Yes No Yes
19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f 19 a1f 19 a1g	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	No No Yes Yes No No No No No No No No Yes
19	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	No No Yes Yes No No No No No No No Yes
19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f 19 a1g 19 a1h 19 a1h1 19 a1h2	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? MSBs MVTSs	No No Yes Yes No No No No No No No No No No No No No
19	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	No No Yes Yes No No No No No No No Yes
19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1c 19 a1d 19 a1f 19 a1f 19 a1f 19 a1h 19 a1h1 19 a1h2 19 a1h3	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? MSBs MVTSs PSPs	No No Yes Yes No No No No No No No No No No No No No
19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f 19 a1g 19 a1h 19 a1h1 19 a1h2	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? MSBs MVTSs PSPs Does the Entity have processes and procedures in place	No No No Yes Yes No No No No No No No No No No No No No
19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1c 19 a1d 19 a1f 19 a1f 19 a1f 19 a1h 19 a1h1 19 a1h2 19 a1h3	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? MSBs MVTSs PSPs Does the Entity have processes and procedures in place to identify downstream relationships with MSBs	No No Yes Yes No No No No No No No No No No No No No
19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f 19 a1g 19 a1h 19 a1h1 19 a1h2 19 a1h3 19 a1i	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? MSBS MVTSs PSPs Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	No No Yes Yes No No No Yes No Yes No No No No No No No No No No No No No
19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1c 19 a1d 19 a1f 19 a1f 19 a1f 19 a1h 19 a1h1 19 a1h3 19 a1i	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? MSBs MVTSs PSPs Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs? Cross-Border Bulk Cash Delivery	No No Yes Yes No No Yes No Yes No Yes No No No No No No No No No No No No No
19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f 19 a1g 19 a1h 19 a1h1 19 a1h2 19 a1h3 19 a1i	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? MSBS MVTSs PSPs Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	No No Yes Yes No No No Yes No Yes No No No No No No No No No No No No No

19 d	Domestic Bulk Cash Delivery	No
19 e		No
19 f		No
19 g		No
19 h		No
19 i	Payment services to non-bank entities who may then	
131	offer third party payment services to their customers?	
	oner tillid party payment services to their customers:	No
19 i1	If Y , please select all that apply below?	
19 i2	Third Party Payment Service Providers	
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	
19 j		No
19 k	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	No
19 m		No
19 n	Trade Finance	Yes
19 o		No No
19 p	For each of the following please state whether you offer	
p	the service to walk-in customers and if so, the applicable	
	level of due diligence:	
19 p1		No
19 p1a	If yes, state the applicable level of due diligence	
19 p1a 19 p2		No
		TWO
19 p2a	If yes, state the applicable level of due diligence	Nia
19 p3		No
	If yes, state the applicable level of due diligence	
19 p4		No
19 p4a	If yes, state the applicable level of due diligence	
19 p5	If you offer other services to walk-in customers please	
	provide more detail here, including describing the level of	
	due diligence.	
19 q	Other high-risk products and services identified by the	
	Entity (please specify)	CV Trading Third Darky
		FX Trading Third Party
		Demand Deposit Accounts (Checking, Savings)
20	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches.	No
20 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	
		See BBVA Due Diligence for global branches of BBVA S.A.
21	If appropriate, provide any additional information/context	
	to the answers in this section.	
	to the unswers in this section.	
3 AML CT	F & 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	PEP Screening	Yes
22 k	Risk Assessment	Yes
22 I	Sanctions	Yes
	0	Yes
22 m	Suspicious Activity Reporting	100
22 m 22 n	Training and Education	Yes
22 n	Training and Education	Yes
22 n 22 o	Training and Education Transaction Monitoring	Yes Yes
22 n	Training and Education Transaction Monitoring How many full time employees are in the Entity's AML,	Yes
22 n 22 o 23	Training and Education Transaction Monitoring How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	Yes Yes
22 n 22 o	Training and Education Transaction Monitoring How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? Is the Entity's AML, CTF & Sanctions policy approved at	Yes Yes 11-100
22 n 22 o 23	Training and Education Transaction Monitoring How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior	Yes Yes
22 n 22 o 23	Training and Education Transaction Monitoring How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? Is the Entity's AML, CTF & Sanctions policy approved at	Yes Yes 11-100

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25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes
26 a	If Y, provide further details	Back Office real-time message and payment screening for Sanctions by team based in Madrid. AML and Sanctions BAU support by contractors based in U.S.
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	See BBVA Due Diligence for global branches of BBVA S.A.
29	If appropriate, provide any additional information/context to the answers in this section.	
4. ANTI B	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to monitor the	Yes
37	effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk	
40 a	components detailed below: Potential liability created by intermediaries and other	V
	third-party providers as appropriate	Yes
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	Yes
	Procedures?	166
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	No
	subject to ABC risk have been outsourced	
42 f	Non-employed workers as appropriate	V.
	(contractors/consultants)	Yes
43	Does the Entity provide ABC training that is targeted to	
73	specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	
44 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	Regarding question 42e, it should be noted that BBVA does not provide training to all non-employed workers but it does provide training to certain high-risk non-employed workers such as agents. BBVA requires all its third parties to certify their commitment to comply with all applicable anti-corruption laws.
5. AML, CT	F & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least	Yes
48	annually? Has the Entity chosen to compare its policies and	
40.0	procedures against: U.S. Standards	Yes
48 a		
48 a1	If Y, does the Entity retain a record of the results?	Yes
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	Yes
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 c	Prohibit dealing with other entities that provide banking	Yes
	services to unlicensed banks	TES .
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services	
	to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes
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	Yes
	existing customer relationships due to financial crime risk	
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
49 I	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
	1 - 1 2 mm alchinamana mina ,	

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	No
52 a	If N, clarify which questions the difference/s relate to and	
52 a	the branch/es that this applies to.	
	the branchies that this applies to.	Con PRIA Pro Pittoria Control India Anna (PRIA CA
		See BBVA Due Diligence for global branches of BBVA S.A.
53	If appropriate, provide any additional information/context	
	to the answers in this section.	
6 AMI CTE	& SANCTIONS RISK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the inherent	
J-7	risk components detailed below:	
F4 a	Client	Vec
54 a		Yes
54 b	Product	Yes
54 c	Channel	Yes
54 d	Geography	Yes
55	Does the Entity's AML & CTF EWRA cover the controls	
	effectiveness components detailed below:	
55 a	Transaction Monitoring	Yes
55 b	Customer Due Diligence	Yes
55 c	PEP Identification	Yes
55 d	Transaction Screening	Yes
55 e	Name Screening against Adverse Media/Negative News	Yes
55 f	Training and Education	Yes
55 g	Governance	Yes
	Management Information	
55 h		Yes
56	Has the Entity's AML & CTF EWRA been completed in	Yes
	the last 12 months?	
56 a	If N, provide the date when the last AML & CTF EWRA	
	was completed.	
57	Does the Entity's Sanctions EWRA cover the inherent	
01	risk components detailed below:	
57 a	Client	Yes
57 b	Product	Yes
57 C	Channel	Yes
57 d	Geography	Yes
58	Does the Entity's Sanctions EWRA cover the controls	
	effectiveness components detailed below:	
58 a	Customer Due Diligence	Yes
58 b	Governance	Yes
58 c	List Management	Yes
58 d	Management Information	Yes
58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59 59	Has the Entity's Sanctions EWRA been completed in the	
	last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA	
00 a	was completed.	
	Tab sompletou.	
60	Confirm that all responses associated to the other of the	
60	Confirm that all responses provided in the above Section	No
	are representative of all the LE's branches	
60 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	
		See BBVA Due Diligence for global branches of BBVA S.A.
61	If appropriate, provide any additional information/context	
	to the answers in this section.	
7 KVC CI	DD and EDD	
		Nz.
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	
	CDD must be completed, e.g. at the time of onboarding	Yes
	or within 30 days?	
64	Which of the following does the Entity gather and retain	
	when conducting CDD? Select all that apply:	

64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
		V
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied	10%
	to beneficial ownership identification?	
67	Does the due diligence process result in customers	Yes
	receiving a risk classification?	163
67 a	If Y, what factors/criteria are used to determine the	
	customer's risk classification? Select all that apply:	
67.04		Ven
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)	
07 40	Other (specify)	We also use the duration of the relationship, the current activity/trading volume, and the sanctions screening risk.
68	For high risk non-individual customers, is a site visit a	.,
	part of your KYC process?	Yes
60.0	If Y, is this at:	
68 a		
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4	Other	No
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
69 a3	Trigger event	Yes
		165
70	What is the method used by the Entity to screen for	Combination of automated and manual
	Adverse Media/Negative News?	
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
	KYC renewal	
71 a2		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		
		No No
74 a5 74 a6	Trigger-based or perpetual monitoring reviews Other (Please specify)	Yes
75 76	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews? From the list below, which categories of customers or	Yes
	industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	

76.0	Arma dafanaa military	EDD as girls based accuracy
76 a	Arms, defence, military	EDD on risk-based approach
76 b 76 b1	Respondent Banks If EDD or restricted, does the EDD assessment contain	EDD on risk-based approach
76 01	the elements as set out in the Wolfsberg Correspondent	Yes
	Banking Principles 2022?	
76 c	Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	EDD on risk-based approach
76 e	Gambling customers	EDD on risk-based approach
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	EDD on risk-based approach
76 i	Non-account customers	Prohibited
76 j	Non-Government Organisations	EDD on risk-based approach EDD on risk-based approach
76 k 76 l	Non-resident customers Nuclear power	EDD on risk-based approach
76 m	Payment Service Providers	EDD on risk-based approach
76 n	PEPs	EDD on risk-based approach
76 o	PEP Close Associates	EDD on risk-based approach
76 p	PEP Related	EDD on risk-based approach
76 q	Precious metals and stones	EDD on risk-based approach
76 r	Red light businesses/Adult entertainment	Do not have this category of customer or industry
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v	Unregulated charities	Do not have this category of customer or industry
76 w 76 x	Used Car Dealers Virtual Asset Service Providers	Do not have this category of customer or industry Do not have this category of customer or industry
76 y	Other (specify)	Do not have this category or customer or industry
, o y	Other (Specify)	
		EDD on risk-based approach
		<u>'</u>
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
79	Does the Entity have specific procedures for onboarding	
	entities that handle client money such as lawyers,	No
	accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or quality	Yes
	review on clients subject to EDD?	163
81	Confirm that all responses provided in the above Section	No
81 a	are representative of all the LE's branches If N. clarify which questions the difference/s relate to and	
01 a	the branch/es that this applies to	
	the braneries that this applies to	See BBVA Due Diligence for global branches of BBVA S.A.
		See 19 17 19 30 Singariot 19 19 19 19 19 19 19 19 19 19 19 19 19
82	If appropriate, provide any additional information/context	
	to the answers in this section.	The entities listed in 79 would be subjected to BBVA high-risk customer EDD and account maintainance
		processes.
8 MONIT	ORING & REPORTING	
83	Does the Entity have risk based policies, procedures and	
55	monitoring processes for the identification and reporting	Yes
	of suspicious activity?	
84	What is the method used by the Entity to monitor	Combination of automated and manual
	transactions for suspicious activities?	Compination of automated and manual
84 a	If manual or combination selected, specify what type of	
	transactions are monitored manually	All activity have automated monitoring. Official checks and trade finance activities have additional
		manual monitoring.
84 b	If automated or combination selected, are internal	D #
~·~	system or vendor-sourced tools used?	Both
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the	
	name of the vendor/tool?	
		Mantas Oracle
04 50	When we the teel last water 10	
84 b2	When was the tool last updated?	
84 b3	When was the automated Transaction Monitoring	< 1 year
0.5	application last calibrated?	···
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
		I .

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85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
90 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to	See BBVA Due Diligence for global branches of BBVA S.A.
91	If appropriate, provide any additional information/context to the answers in this section.	
9. PAYMEN	│ IT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	Bank Secrecy Act (BSA) rule [31 CFR 103.33(g)] (also referred to as the Travel rule) in the U.S. requires banks to transmit certain information to other banks
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	See BBVA Due Diligence for global branches of BBVA S.A.
97	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
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes

100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Both Automated and Manual
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Accuity Inc. and Lexis Nexis Risk Solutions
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Combination of automated and manual 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 106 f	Lists maintained by other G7 member countries Other (specify)	Used for screening customers and beneficial owners and for filtering transactional data
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	No
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	See BBVA Due Diligence for global branches of BBVA S.A.
110	If appropriate, provide any additional information/context to the answers in this section.	
11 TRAINII	NG & EDUCATION	
111	Does the Entity provide mandatory training, which	
111 a	includes: Identification and reporting of transactions to government	v .
111 b	authorities Examples of different forms of money laundering,	Yes
	terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
	the types of products and services offered	
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 c	Internal policies for controlling money laundering,	Yes Yes

111 e 111 f		
<u>111 f</u>	Conduct and Culture	Yes
	Fraud	Yes
112	Is the above mandatory training provided to :	
	Board and Senior Committee Management	Ven
112 a		Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
		160
112 e	Third parties to which specific FCC activities have been	No
	outsourced	
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
444.0	If Y, how frequently is training delivered?	Other
114 a		Other
115	Confirm that all responses provided in the above Section	No
	are representative of all the LE's branches	140
115 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	
	the branenes that this applies to.	Con DDVA Due Dilingue for stable brooker of DDVA CA
		See BBVA Due Diligence for global branches of BBVA S.A.
116	If appropriate, provide any additional information/context	
	to the answers in this section.	
	to and unlowers in and section.	
12. QUALITY	Y ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality	
117		N
	Assurance programme for financial crime (separate from	Yes
	the independent Audit function)?	
118	Does the Entity have a program wide risk based	
	Compliance Testing process (separate from the	Yes
	independent Audit function)?	
119	Confirm that all responses provided in the above Section	No
	are representative of all the LE's branches	
119 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	
	the branenes that this applies to.	Con DDVA Due Dilingue for stable brooker of DDVA CA
		See BBVA Due Diligence for global branches of BBVA S.A.
120	If appropriate, provide any additional information/context	
	to the answers in this section.	
	to the answers in this section.	
13. AUDIT		
	In addition to increasing the second	
121	In addition to inspections by the government	
	supervisors/regulators, does the Entity have an internal	
	audit function, a testing function or other independent	Voc
	audit function, a testing function or other independent	Yes
	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC,	Yes
	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular	Yes
100	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC,	Yes
122	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department	Yearly
	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a 122 b	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department External Third Party	Yearly
122 a	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent	Yearly
122 a 122 b 123	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent third party cover the following areas:	Yearly
122 a 122 b	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and	Yearly
122 a 122 b 123 123 a	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yearly Not Applicable Yes
122 a 122 b 123	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and	Yearly Not Applicable
122 a 122 b 123 123 a 123 b	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yearly Not Applicable Yes Yes
122 a 122 b 123 123 a 123 a 123 c	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance	Yearly Not Applicable Yes Yes Yes
122 a 122 b 123 123 a 123 a 123 c 123 d	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies	Yearly Not Applicable Yes Yes Yes Yes Yes
122 a 122 b 123 123 a 123 a 123 c 123 d 123 e	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management	Yearly Not Applicable Yes Yes Yes Yes Yes Yes Yes
122 a 122 b 123 123 a 123 a 123 c 123 c 123 d 123 e 123 f	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies	Yearly Not Applicable Yes Yes Yes Yes Yes
122 a 122 b 123 123 a 123 a 123 c 123 c 123 d 123 e 123 f	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information	Yearly Not Applicable Yes Yes Yes Yes Yes Yes Yes Yes
122 a 122 b 123 123 a 123 a 123 c 123 d 123 e 123 f 123 g	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing	Yearly Not Applicable Yes Yes Yes Yes Yes Yes Yes Yes Yes Y
122 a 122 b 123 123 a 123 a 123 c 123 d 123 e 123 f 123 g 123 h	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology	Yearly Not Applicable Yes Yes Yes Yes Yes Yes Yes Yes Yes Y
122 a 122 b 123 123 a 123 c 123 c 123 d 123 e 123 f 123 g 123 g 123 h 123 i	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring	Yearly Not Applicable Yes Yes Yes Yes Yes Yes Yes Y
122 a 122 b 123 123 a 123 a 123 c 123 d 123 e 123 f 123 g 123 h	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology	Yearly Not Applicable Yes Yes Yes Yes Yes Yes Yes Yes Yes Y
122 a 122 b 123 123 a 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions	Yearly Not Applicable Yes Yes Yes Yes Yes Yes Yes Yes Yes Y
122 a 122 b 123 123 a 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education	Yearly Not Applicable Yes Yes Yes Yes Yes Yes Yes Y
122 a 122 b 123 123 a 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions	Yearly Not Applicable Yes Yes Yes Yes Yes Yes Yes Yes Yes Y
122 a 122 b 123 123 a 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education	Yearly Not Applicable Yes Yes Yes Yes Yes Yes Yes Yes Yes Y
122 a 122 b 123 123 a 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education	Yearly Not Applicable Yes Yes Yes Yes Yes Yes Yes Yes Yes Y
122 a 122 b 123 123 a 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education	Yearly Not Applicable Yes Yes Yes Yes Yes Yes Yes Yes Yes Y
122 a 122 b 123 123 a 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education	Yearly Not Applicable Yes Yes Yes Yes Yes Yes Yes Yes Yes Y
122 a 122 b 123 123 a 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k 123 I	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify)	Yearly Not Applicable Yes Yes Yes Yes Yes Yes Yes Yes Yes Y
122 a 122 b 123 123 a 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit	Yearly Not Applicable Yes Yes Yes Yes Yes Yes Yes Yes Yes Y
122 a 122 b 123 123 a 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k 123 I	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify)	Yearly Not Applicable Yes Yes Yes Yes Yes Yes Yes Yes Yes Y

125	Confirm that all responses provided in the above section are representative of all the LE's branches	No
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	See BBVA Due Diligence for global branches of BBVA S.A.
126	If appropriate, provide any additional information/context to the answers in this section.	
14. FRAU	D	
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes
129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	No
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	See BBVA Due Diligence for global branches of BBVA S.A.
132	If appropriate, provide any additional information/context to the answers in this section.	
Declaration	on 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)

BBVA NEW YORK

(Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

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

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

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

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

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

Date: March 7th, 2024



Financial Institution Name:	
Location (Country) :	

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	
2	Append a list of foreign branches which are covered	
	by this questionnaire	
3	Full Legal (Registered) Address	
	an Logar (regionarou) / nauroso	
4	Full Primary Business Address (if different from	
4	above)	
	above)	
5	Date of Entity incorporation/establishment	
6	Select type of ownership and append an ownership	
	chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	
6 b	Member Owned/Mutual	
6 c	Government or State Owned by 25% or more	
6 d	Privately Owned	
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer	
	shares	
8	Does the Entity, or any of its branches, operate under	
	an Offshore Banking License (OBL)?	
8 a	If Y, provide the name of the relevant branch/es	
o a	which operate under an OBL	
	million operate and all object	
0	Does the Bank have a Virtual Bank License or	
9	provide services only through online channels?	
40		
10	Name of primary financial regulator/supervisory authority	
	authority	
11	Provide Legal Entity Identifier (LEI) if available	
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	
	1	l .

13	Jurisdiction of licensing authority and regulator of	
	ultimate parent	
14	Select the business areas applicable to the Entity	
14 a		
	Retail Banking	
14 b	Private Banking	
14 c	Commercial Banking	
14 d	Transactional Banking	
	<u> </u>	
14 e	Investment Banking	
14 f	Financial Markets Trading	
14 g	Securities Services/Custody	
14 h	Broker/Dealer	
14 i		
	Multilateral Development Bank	
14 j	Wealth Management	
14 k	Other (please explain)	
15	Does the Entity have a significant (10% or more)	
	portfolio of non-resident customers or does it derive	
	more than 10% of its revenue from non-resident	
	customers? (Non-resident means customers primarily	
	resident in a different jurisdiction to the location	
	where bank services are provided)	
45 -	If V passide the ten five events and the	
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	
16 b	Total Assets	
17	Confirm that all responses provided in the above	
l.,	Section are representative of all the LE's branches.	
	•	
17 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
18	If appropriate, provide any additional	
	information/context to the answers in this section.	
2. PRODU	CTS & SERVICES	
19	Does the Entity offer the following products and	
1	services:	
10.		
19 a	Correspondent Banking	
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking	
	services to domestic banks?	
10 016	Does the Entity allow domestic bank clients to	
19 a1b		
L	provide downstream relationships?	
19 a1c	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	
	domestic banks?	
10 -1 -1		
19 a1d	Does the Entity offer Correspondent Banking	
	services to foreign banks?	
19 a1e	Does the Entity allow downstream relationships	
	with foreign banks?	
10 a1f		
19 a1f	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	
	foreign banks?	
19 a1g	Does the Entity offer Correspondent Banking	
July	services to regulated Money Services Businesses	
L	(MSBs)/Money Value Transfer Services (MVTSs)?	
19 a1h	Does the Entity allow downstream relationships	
	with MSBs, MVTSs, or Payment Service Provider	
	(PSPs)?	
L	,	
19 a1h1	MSBs	
19 a1h2	MVTSs	
19 a1h3	PSPs	
		1

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	
19 c	Cross-Border Remittances	
19 d	Domestic Bulk Cash Delivery	
19 e	Hold Mail	
19 f	International Cash Letter	
19 g	Low Price Securities	
19 h	Payable Through Accounts	
19 i	Payment services to non-bank entities who may	
	then offer third party payment services to their customers?	
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	
19 j	Private Banking	
19 k	Remote Deposit Capture (RDC)	
19 I	Sponsoring Private ATMs	
19 m	Stored Value Instruments	
19 n	Trade Finance	
19 o	Virtual Assets	
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	
19 p4a 19 p5	If yes, state the applicable level of due diligence If you offer other services to walk-in customers	
19 þ5	please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	
3. AML, C	TF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum	
	AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	
22 b	Adverse Information Screening	
22 c	Beneficial Ownership	
22 d	Cash Reporting	
22 e	CDD	
22 f	EDD	
22 g	Independent Testing	
22 h	Periodic Review	
22 i	Policies and Procedures	
22 j	PEP Screening	
22 k	Risk Assessment	
22 I	Sanctions	

27 Taming and Excellent 28 How many full sine employees are in the Entity's MAL, CTF & Sanctions Deployees are in the Entity's AMA, CTF & Sanctions Deploy approved attested annually by the Body or equivalent Senior or equivalent Senior annually by the Body or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior or equivalent Senior Senior or equivalent Senior Senior or equivalent Senior Senior or equivalent Senior Senior or equivalent Senior Senior or equivalent Senior Senior or equivalent Senior Senior or equivalent Senior Senior or equivalent Senior Senior or equivalent Senior Senior or equivalent Senior Senior Senior or equivalent Senior Senior Senior or equivalent Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Senior Seni	22 m	Suspicious Activity Reporting	
22 a many full stime employees are in the Entity's AMU, CTF & Sanctions Compliance (Part AMU, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Monagement (Part AMU, CTF & Sanctions policy product at least annually by the Board or equivalent Senior Monagement (Part AMU, CTF & Sanctions policy product at least annually by the Board or equivalent Senior Monagement (Part AMU, CTF, & Sanctions programmer) 25 a Confirm the Board respirate special control of the AMU, CTF, & Sanctions programmer? 26 a FY, provide further details 27 Does the entity use third patries to carry out any components of the AMU, CTF, & Sanctions programmer? 28 a FY, provide further details 29 Confirm that all responses provided at the above Socious are applicated the special of the LES branches Socious are applicated the special of the LES branches Socious are applicated the special of the ABOV CONTROL (Part AMU, CTF, AMU) and the provided annual of the ABOV CONTROL (Part AMU) and the provided annual of the ABOV CONTROL (Part AMU) and the provided annual of the ABOV CONTROL (Part AMU) and the provided annual of the ABOV CONTROL (Part AMU) and the provided annual of the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part			
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components detailed below: 40 a Potential liability created by intermediaries and		is the net result of the controls effectiveness and the inherent risk assessment?	
		components detailed below:	
	40 a		

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	
40 с	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	
40 e	Changes in business activities that may materially increase the Entity's corruption risk	
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	
42 b	1st Line of Defence	
42 c	2nd Line of Defence	
42 d	3rd Line of Defence	
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	
42 f	Non-employed workers as appropriate (contractors/consultants)	
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
5. AML, C	TF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	
46 b	Terrorist financing	
46 c	Sanctions violations	
47	Are the Entity's policies and procedures updated at least annually?	
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	
48 b1	If Y, does the Entity retain a record of the results?	
48 b1 49	If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that:	
48 b1	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	
48 b1 49	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	
48 b1 49 49 a	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	
48 b1 49 49 a 49 b	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	
48 b1 49 49 a 49 b 49 c 49 d	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	
48 b1 49 49 a 49 b 49 c 49 d 49 e	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	
48 b1 49 49 a 49 b 49 c 49 d 49 e	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 NBFls Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities	
48 b1 49 49 a 49 b 49 c 49 d 49 e	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 NBFls Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for	

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

58 e	Name Screening	
58 f	Transaction Screening	
58 g	Training and Education	
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	
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	
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?	
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?	
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	
64 b	Expected activity	
64 c	Nature of business/employment	
64 d	Ownership structure	
64 e	Product usage	
64 f	Purpose and nature of relationship	
64 g	Source of funds	
64 h	Source of wealth	
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	
65 a1	Are ultimate beneficial owners verified?	
65 b		
	Authorised signatories (where applicable)	
65 c	Key controllers	
65 d	Other relevant parties	
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	
67	Does the due diligence process result in customers receiving a risk classification?	
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	
67 a2	Geography	
67 a3	Business Type/Industry	
67 a4	Legal Entity type	
67 a5	Adverse Information	
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	
68 a	If Y, is this at:	
68 a1	Onboarding	
68 a2	KYC renewal	
68 a3	Trigger event	
68 a4	Other	
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	
69 a	If Y, is this at:	
69 a1	Onboarding	
69 a2	KYC renewal	

69 a3	Trigger event	
69 a3 70	Trigger event	
	What is the method used by the Entity to screen for Adverse Media/Negative News?	
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
71 a	If Y, is this at:	
71 a1	Onboarding	
71 a2	KYC renewal	
71 a3	Trigger event	
72	What is the method used by the Entity to screen PEPs?	
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	
74 a	If yes, select all that apply:	
74 a1	Less than one year	
74 a2	1 – 2 years	
74 a3	3 – 4 years	
74 a4 74 a5	5 years or more Trigger-based or perpetual monitoring reviews	
74 a5 74 a6	Other (Please specify)	
7440	Outer (Frease specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	
76 b	Respondent Banks	
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	
76 d	Extractive industries	
76 e	Gambling customers	
76 f	General Trading Companies	
76 g	Marijuana-related Entities	
76 h	MSB/MVTS customers	
76 i	Non-account customers	
76 j	Non-Government Organisations	
76 k	Non-resident customers	
76 I	Nuclear power	
76 m	Payment Service Providers	
76 n	PEPs	
76 o	PEP Close Associates	
76 p	PEP Related	
76 q	Precious metals and stones	
76 r	Red light businesses/Adult entertainment	
76 s	Regulated charities	
76 t	Shell banks	
76 u	Travel and Tour Companies	
76 v	Unregulated charities	
76 w	Used Car Dealers	
76 x 76 y	Virtual Asset Service Providers Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	

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

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
00 -	'	
93 a	FATF Recommendation 16	
93 b	Local Regulations	
93 b1	If Y, specify the regulation	
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC	TIONS	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	
102	What is the method used by the Entity for sanctions screening?	
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	
104	What is the method used by the Entity?	

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

115 а	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
12. QUALI	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based	
	Quality Assurance programme for financial crime (separate from the independent Audit function)?	
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
13. AUDIT		
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	
122 b	External Third Party	
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	
123 b	Enterprise Wide Risk Assessment	
123 c 123 d	Governance KYC/CDD/EDD and underlying methodologies	
123 u	Name Screening & List Management	
123 f	Reporting/Metrics & Management Information	
123 g	Suspicious Activity Filing	
123 h	Technology	
123 i	Transaction Monitoring	
123 j	Transaction Screening including for sanctions	
123 k 123 l	Training & Education Other (specify)	
1231	Outer (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	
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. FRAU	סנ	
127	Does the Entity have policies in place addressing fraud risk?	
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	
	•	

129	Does the Entity have real time monitoring to detect fraud?		
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?		
131	Confirm that all responses provided in the above section are representative of all the LE's branches		
131 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.		
Declarat	ion Statement		
Declaration	Group Correspondent Banking Due Diligence Questionnaire 2023 (CBI Statement (To be signed by Global Head of Correspondent Bankin V Laundering, Chief Compliance Officer, Global Head of Financial C	ng or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of	
every effort		n name) is fully committed to the fight against financial crime and makes regulations and standards in all of the jurisdictions in which it does business and holds accounts.	
	ial Institution understands the critical importance of having effective egulatory obligations.	e and sustainable controls to combat financial crime in order to protect its reputation and to meet its	
The Financi standards.	ial Institution recognises the importance of transparency regarding	parties to transactions in international payments and has adopted/is committed to adopting these	
	ial Institution further certifies it complies with / is working to comply ation provided in this Wolfsberg CBDDQ will be kept current and wi	with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. Il be updated no less frequently than every eighteen months.	
The Financi	ial Institution commits to file accurate supplemental information on	a timely basis.	
I, the answers Institution.	,(Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that he 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 nstitution.		
I, Wolfsberg (, (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.		
	(Signature & Date		
_ A)	(Signature & Date		



Financial Institution Name:	
Location (Country) :	

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	
2	Append a list of foreign branches which are covered	
	by this questionnaire	
3	Full Legal (Registered) Address	
	an Logar (regionarou) / nauroso	
4	Full Primary Business Address (if different from	
4	above)	
	above)	
5	Date of Entity incorporation/establishment	
6	Select type of ownership and append an ownership	
	chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	
6 b	Member Owned/Mutual	
6 c	Government or State Owned by 25% or more	
6 d	Privately Owned	
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer	
	shares	
8	Does the Entity, or any of its branches, operate under	
	an Offshore Banking License (OBL)?	
8 a	If Y, provide the name of the relevant branch/es	
o a	which operate under an OBL	
	million operate and all object	
0	Does the Bank have a Virtual Bank License or	
9	provide services only through online channels?	
40		
10	Name of primary financial regulator/supervisory authority	
	authority	
11	Provide Legal Entity Identifier (LEI) if available	
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	
	1	l .

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

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	
19 c	Cross-Border Remittances	
19 d	Domestic Bulk Cash Delivery	
19 e	Hold Mail	
19 f	International Cash Letter	
19 g	Low Price Securities	
19 h	Payable Through Accounts	
19 i	Payment services to non-bank entities who may	
	then offer third party payment services to their customers?	
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	
19 j	Private Banking	
19 k	Remote Deposit Capture (RDC)	
19 I	Sponsoring Private ATMs	
19 m	Stored Value Instruments	
19 n	Trade Finance	
19 o	Virtual Assets	
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	
19 p4a 19 p5	If yes, state the applicable level of due diligence If you offer other services to walk-in customers	
19 þ5	please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	
3. AML, C	TF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum	
	AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	
22 b	Adverse Information Screening	
22 c	Beneficial Ownership	
22 d	Cash Reporting	
22 e	CDD	
22 f	EDD	
22 g	Independent Testing	
22 h	Periodic Review	
22 i	Policies and Procedures	
22 j	PEP Screening	
22 k	Risk Assessment	
22 I	Sanctions	

27 Training and Execution 28 Training and Execution 29 Town wanty full sime employees are in the Ensity's AM, CTF & Sendonica Compliance Operatment? 24 Is the Ensity's AMM, CTF & Sendonica Conjunctive Operatment? 25 Is the Ensity's AMM, CTF & Sendonica Operatment? 26 Is the Ensity's AMM, CTF & Sendonica Operatment? 27 Is the Execution Sendonical Compliance Operatment? 28 Operatment of the Execution of the Sendonical Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of Compliance Operatment of C	22 m	Suspicious Activity Reporting		
22 Among Maller Company for the employees are in the Entity's AMIL, CT & Sancions Corregilance Department? 24 Is the Entity AMIL CT & Sancions policy approved at least annually by the Board or equivalent Senior Management Commised P. M. describe your protice. 25 Deep the Board requive, assess, and hallenge equivalent Senior Management Commised P. M. describe your protice. 26 Deep the Board requive, assess, and hallenge equivalent Senior management of the Entity use thirty and the protice of the Sancions programme? 26 a				
AML CF & Sanctions policy approved at the Entity's ALL CF & Sanctions policy approved at the ast annually by the Board roots, post protection of the Entity's ALL CF & Sanctions policy approved at the ast annually by the Board roots, assess, and challenge programs of the Board roots, assess, and challenge programs of the Board roots, assess, and challenge programs of the Board roots, assess, and challenge programs of the Board roots, assess, and challenge programs of the Board roots, assess, and challenge programs of the Board roots, assess, and challenge programs of the Board roots, assess, and challenge programs of the Board roots, assess, and challenge programs of the Board roots, assess, and challenge programs of the Board roots, assess, and challenge programs of the Board roots, assess, and challenge programs of the Board roots, assessment of the Board roots, assessment of the Board roots, assessment of the Board roots, assessment of the Board roots, assessment of the Board roots, assessment of the Board roots, assessment of the Board roots, assessment of the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board roots and the Board		· ·		
s the Entity's AML, CTF & Sanctions policy approved at attest annually by the Board or equivalent Penior Management Committee? If N, describe your practice in Cuestion 29. 25 Does the Scard receive, assess, and challenge regular reporting receive in Cuestion 29. 26 Does the Scard receive, assess, and challenge regular reporting receive in Cuestion programme? 27 Does the entity see that in parties to carry out any out provided in the activity opinion of the AML, CTF & Sanctions programme? 28 Does the entity have a whiteledictower policy? 29 Continue that all responses provided in the above Section are representative of all the LEb branches 20 Land and the branches had this applies to. 20 If appropriate, provide any additional information of the activity of the activity which questions the differenced relate to and the branches had this applies to. 29 If appropriate, provide any additional information-to-critical to the answers in this section. 4. ANTI BRIBERY & CORRUPTION 4. ANTI BRIBERY & CORRUPTION 4. ANTI BRIBERY & CORRUPTION 30 Hear be Entry Accommented policies and procedures requirements to reasonably prevent, detect and requirements to reasonably prevent, detect and report bribery and corruption? 31 Does the Entry brave adequate staff with appropriate technic programme that sets minimum ABC slandards? 32 Hear the Entry Accommented policies and procedures responsible for conditional process to implement the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the ABC policy in the AB		How many full time employees are in the Entity's		
Sanctions programme? 28 Does the Entity use third parties to carry out any components of Ist AML, CTF, & Sanctions programme? 28 a If Y, provide further details 29 A If Y, provide further details 20 Does the entity have a whistebilower policy? 20 Confirm that all responses provided in the above Section are representative of all the LE's branches 20 a If Island and the branches that this applies to and the branches that this applies to and the branches that this applies to and the branches that this applies to. 29 If appropriate, provide any additional information branches that this applies to. 4. ANTI BRIBERY & CORRUPTION 30 Has the Entity Accumented policies and procedures consistent with applicable ABC regulation and requirements to reasonably prevent, detect and report briefly and complete they are an enterprise wide programme his test minimum ABC signatures. 31 Does the Entity have an enterprise wide programme his test minimum ABC signatures? 32 Has the Entity appointed a designate for exponence? 33 One the Entity have all enterprise with minimum ABC signatures? 34 Is the Entity's and Companies the birth programme? 35 Does the Entity have a global ABC population in evel of exponence-desportate to implement the ABC programme? 36 Does the Entity have a global ABC population in evel of exponence-desportate to implement the ABC programme? 35 Does the Entity have a global ABC population in evel of exponence-desportate to implement the ABC programme? 36 Does the Entity have a global ABC population or receiving of three? This includes promissing, offering, giving, solicitation or receiving of three? This includes promissing, offering, giving, solicitation or receiving of three this provide in place to mornitum the ABC population and records the tray by within the ABC policy that includes promissing, offering, giving, solicitation or books and records the tray by within the ABC policy or any other policy applicable to the Legal Entity? 37 Does the Entity have a season and the internet this is the	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		
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		components detailed below:		
	40 a			

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	
40 с	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	
40 e	Changes in business activities that may materially increase the Entity's corruption risk	
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	
42 b	1st Line of Defence	
42 c	2nd Line of Defence	
42 d	3rd Line of Defence	
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	
42 f	Non-employed workers as appropriate (contractors/consultants)	
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
5. AML, C	TF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	
46 b	Terrorist financing	
46 c	Sanctions violations	
47	Are the Entity's policies and procedures updated at least annually?	
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	
48 b1	If Y, does the Entity retain a record of the results?	
48 b1 49	If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that:	
48 b1	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	
48 b1 49	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	
48 b1 49 49 a	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	
48 b1 49 49 a 49 b	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	
48 b1 49 49 a 49 b 49 c 49 d	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	
48 b1 49 49 a 49 b 49 c 49 d 49 e	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	
48 b1 49 49 a 49 b 49 c 49 d 49 e 49 f	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 NBFls Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities	
48 b1 49 49 a 49 b 49 c 49 d 49 e	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 NBFls Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for	

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

58 e	Name Screening	
58 f	Transaction Screening	
58 g	Training and Education	
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	
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	
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?	
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?	
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	
64 b	Expected activity	
64 c	Nature of business/employment	
64 d	Ownership structure	
64 e	Product usage	
64 f	Purpose and nature of relationship	
64 g	Source of funds	
64 h	Source of wealth	
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	
65 a1	Are ultimate beneficial owners verified?	
65 b		
	Authorised signatories (where applicable)	
65 c	Key controllers	
65 d	Other relevant parties	
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	
67	Does the due diligence process result in customers receiving a risk classification?	
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	
67 a2	Geography	
67 a3	Business Type/Industry	
67 a4	Legal Entity type	
67 a5	Adverse Information	
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	
68 a	If Y, is this at:	
68 a1	Onboarding	
68 a2	KYC renewal	
68 a3	Trigger event	
68 a4	Other	
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	
69 a	If Y, is this at:	
69 a1	Onboarding	
69 a2	KYC renewal	

69 a3	Trigger event	
69 a3 70	Trigger event	
	What is the method used by the Entity to screen for Adverse Media/Negative News?	
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
71 a	If Y, is this at:	
71 a1	Onboarding	
71 a2	KYC renewal	
71 a3	Trigger event	
72	What is the method used by the Entity to screen PEPs?	
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	
74 a	If yes, select all that apply:	
74 a1	Less than one year	
74 a2	1 – 2 years	
74 a3	3 – 4 years	
74 a4 74 a5	5 years or more Trigger-based or perpetual monitoring reviews	
74 a5 74 a6	Other (Please specify)	
7440	Outer (Frease specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	
76 b	Respondent Banks	
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	
76 d	Extractive industries	
76 e	Gambling customers	
76 f	General Trading Companies	
76 g	Marijuana-related Entities	
76 h	MSB/MVTS customers	
76 i	Non-account customers	
76 j	Non-Government Organisations	
76 k	Non-resident customers	
76 I	Nuclear power	
76 m	Payment Service Providers	
76 n	PEPs	
76 o	PEP Close Associates	
76 p	PEP Related	
76 q	Precious metals and stones	
76 r	Red light businesses/Adult entertainment	
76 s	Regulated charities	
76 t	Shell banks	
76 u	Travel and Tour Companies	
76 v	Unregulated charities	
76 w	Used Car Dealers	
76 x 76 y	Virtual Asset Service Providers Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	

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

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
00 -	'	
93 a	FATF Recommendation 16	
93 b	Local Regulations	
93 b1	If Y, specify the regulation	
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC	TIONS	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	
102	What is the method used by the Entity for sanctions screening?	
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	
104	What is the method used by the Entity?	

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

115 а	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
12. QUALI	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based	
	Quality Assurance programme for financial crime (separate from the independent Audit function)?	
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
13. AUDIT		
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	
122 b	External Third Party	
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	
123 b	Enterprise Wide Risk Assessment	
123 c 123 d	Governance KYC/CDD/EDD and underlying methodologies	
123 u	Name Screening & List Management	
123 f	Reporting/Metrics & Management Information	
123 g	Suspicious Activity Filing	
123 h	Technology	
123 i	Transaction Monitoring	
123 j	Transaction Screening including for sanctions	
123 k 123 l	Training & Education Other (specify)	
1231	Outer (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	
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. FRAU	סנ	
127	Does the Entity have policies in place addressing fraud risk?	
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	
	•	

129	Does the Entity have real time monitoring to detect fraud?		
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?		
131	Confirm that all responses provided in the above section are representative of all the LE's branches		
131 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.		
<u>Declarat</u>	<u>tion Statement</u>		
Declaration	Group Correspondent Banking Due Diligence Questionnaire 2023 (CBD I Statement (To be signed by Global Head of Correspondent Bankin y Laundering, Chief Compliance Officer, Global Head of Financial C	ng or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of	
every effort		n name) is fully committed to the fight against financial crime and makes regulations and standards in all of the jurisdictions in which it does business and holds accounts.	
	cial Institution understands the critical importance of having effective egulatory obligations.	and sustainable controls to combat financial crime in order to protect its reputation and to meet its	
The Financ standards.	The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these		
	ial Institution further certifies it complies with / is working to comply ation provided in this Wolfsberg CBDDQ will be kept current and will	with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. I be updated no less frequently than every eighteen months.	
The Financ	ial Institution commits to file accurate supplemental information on a	timely basis.	
I, the answers Institution.	I, (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.		
I, Wolfsberg (I, (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.		
	(Signature & Date)		
	(Signature & Date)		

the Wolfsberg Group

Financial Institution Name: Location (Country) :

BANCO BILBAO VIZCAYA ARGENTARIA, S.A. HONG KONG

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. ENTIT	TY & OWNERSHIP	CS SHOW THE RESIDENCE OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE P
1	Full Legal Name	
2	Append a list of foreign branches which are covered by this questionnaire	Hong Kong

3	Full Legal (Registered) Address	Unit 9507, Level 95, International Commerce Centre, One Austin Road West, Kowloon, Hong Kong
		One 3007, Level 30, International Continue Centre, One Austin Road West, Rowlour, Hong Rong
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	The Hong Kong Branch (under the former name of Banco Exterior de Espana, S.A.) was
		established in 1985. After several mergers with some Spanish banks thereafter, the name was changed to Banco Bilbao Vizcaya Argentaria, S.A. in 2000.
6	Select type of ownership and append an ownership	
	chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Please select
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	Please select
6 c	Government or State Owned by 25% or more	Please select
6 d	Privately Owned	Please select
6 d1	If Y, provide details of shareholders or ultimate	Fledse select
oui	beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
8	Does the Entity, or any of its branches, operate under	Disconsist
8 a	an Offshore Banking License (OBL)? If Y, provide the name of the relevant branch/es	Please select
o a	which operate under an OBL	
9	Does the Bank have a Virtual Bank License or	Please select
10	provide services only through online channels? Name of primary financial regulator/supervisory	
	authority	Hong Kong Monetary Authority
11	Provide Legal Entity Identifier (LEI) if available	
	(==,, , a.a.a.a	
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	

13	lurisdiction of linearing and the	
13	Jurisdiction of licensing authority and regulator of ultimate parent	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	No
14 b	Private Banking	No
14 c	Commercial Banking	Please select
14 d	Transactional Banking	Please select
14 e	Investment Banking	Please select
14 f	Financial Markets Trading	Please select
14 g	Securities Services/Custody	Please select
14 h	Broker/Dealer	Please select
14 i	Multilateral Development Bank	Please select
14 j 14 k	Wealth Management	No
14 K	Other (please explain)	
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	Yes
15 a	If Y, provide the top five countries where the non- resident customers are located.	Australia, Taiwan, U.S.A., Netherlands, South Korea
16	Calcabilla da da da	
16 a	Select the closest value:	
16 b	Number of employees Total Assets	51-200
17	Confirm that all responses provided in the above	Please select
	Section are representative of all the LE's branches.	Please select
17 а	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	
	UCTS & SERVICES	
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	
19 a1	If Y	Please select
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	No
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	No
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	No
9 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Please select
9 a1e	Does the Entity allow downstream relationships with foreign banks?	Please select
9 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Please select
9 a1g	(MSBs)/Money Value Transfer Services (MVTSs)?	No
9 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
9 a1h1	MSBs	Please select
9 a1h1 9 a1h2 9 a1h3	MATC-	Please select Please select

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	No
19 b	Cross-Border Bulk Cash Delivery	Please select
19 с	Cross-Border Remittances	Please select
19 d	Domestic Bulk Cash Delivery	Please select
19 e	Hold Mail	No
19 f	International Cash Letter	Please select
19 g	Low Price Securities	Please select
19 h	Payable Through Accounts	Please select
3.31.31		Please select
19 i	Payment services to non-bank entities who may 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	No
19 i3	Virtual Asset Service Providers (VASPs)	No
19 i4	eCommerce Platforms	No
19 i5	Other - Please explain	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	Please select
19 I	Sponsoring Private ATMs	Please select
19 m	Stored Value Instruments	No No
	Stored Value Instruments Trade Finance	
19 n		Please select
19 o	Virtual Assets	Please select
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	Please select
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	Please select
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	Please select
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	Not applicable
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Please select
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.	Q19 a1d - BBVA Hong Kong provides correspondent banking services only to BBVA Head Office, a few branches and subsidiary banks mainly in HKD and RMB currencies.
3. AML,	CTF & 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	Please select
22 b	Adverse Information Screening	Please select
22 c	Beneficial Ownership	Please select
22 d	Cash Reporting	Please select
22 e	CDD	Please select
22 f	EDD	Please select
22 g	Independent Testing	Please select
22 h	Periodic Review	Please select
22 i	Policies and Procedures	Please select
22 j	PEP Screening	Please select
22 k	Risk Assessment	Please select
221	Sanctions	Please select
	- 12 - 12 - 12 - 12 - 12 - 12 - 12 - 12	The second section is a second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second

22 m	Suspicious Activity Reporting	Please select
22 n	Training and Education	Please select
22 o	Transaction Monitoring	Please select
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	1-10
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Please select
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Please select
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Please select
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Please select
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	
4 ANTI	BRIBERY & CORRUPTION	
4. ANTI	Has the Entity documented policies and procedures	
30	consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Please select
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Please select
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Please select
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Please select
34	Is the Entity's ABC programme applicable to:	Please select
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Please select
35 b	Includes enhanced requirements regarding interaction with public officials?	Please select
35 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Please select
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Please select
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Please select
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Please select
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Please select
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Please select
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Please select

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Please select
40 с	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Please select
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Please select
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Please select
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Please select
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Please select
42 b	1st Line of Defence	Please select
42 c	2nd Line of Defence	Please select
42 d	3rd Line of Defence	Please select
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Please select
42 f	Non-employed workers as appropriate (contractors/consultants)	Please select
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Please select
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
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 (CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
40	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Please select
46 b	Terrorist financing	Please select
46 c	Sanctions violations	Please select
47	Are the Entity's policies and procedures updated at least annually?	Please select
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	Please select
48 a1	If Y, does the Entity retain a record of the results?	Please select
48 b	EU Standards	Please select
48 b1	If Y, does the Entity retain a record of the results?	Please select
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictilious named accounts	Please select
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Please select
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Please select
49 d	Prohibit accounts/relationships with shell banks	Please select
49 e	Prohibit dealing with another entity that provides services to shell banks	Please select
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Please select
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Please select
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close	Please select

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49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by	
	employees	Please select
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Please select
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Please select
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	Please select
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Please select
49 n	Outline the processes for the maintenance of internal "watchlists"	Please select
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Please select
51	Does the Entity have record retention procedures that comply with applicable laws?	Please select
51 a	If Y, what is the retention period?	Please select
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
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.	
Control of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the State of the Sta	TF & SANCTIONS RISK ASSESSMENT	
6. AML, C 54		
Description of the Artist Co.	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the	Please select
54	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Please select Please select
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Please select Please select
54 a 54 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	Please select
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:	Please select Please select Please select
54 a 54 b 54 c 54 d 55 5	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	Please select Please select Please select Please select
54 a 54 b 54 c 54 d 55 d 55 a 55 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	Please select Please select Please select Please select Please select Please select
54 a 54 b 54 c 54 d 55 d 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	Please select Please select Please select Please select Please select Please select Please select
54 a 54 b 54 c 54 d 55 d 55 a 55 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	Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 54 c 54 d 55 a 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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 54 c 54 d 55 a 55 b 55 c 55 d 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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
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54 a 54 a 54 b 54 c 54 d 55 a 55 b 55 c 55 d 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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 554 c 554 d 555 55 a 55 b 55 c 55 d 55 f 55 g 55 h 56 56 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.	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 f 55 g 55 h 56 56 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.	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 54 c 54 c 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 554 c 554 c 554 c 555 a 555 c 555 c 555 d 555 e 556 a 556 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 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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
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54 a 54 a 54 b 554 c 554 d 555 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 56 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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 554 c 54 d 55 5 c 55 a 55 b 55 c 55 d 55 b 55 6 55 d 55 6 a 57 a 57 b 57 c 57 d 58 a 58 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 Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 554 c 554 c 555 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 a 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: Customer Due Diligence	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select

58 e	Name Screening	Please select
58 f	Transaction Screening	Please select
58 g	Training and Education	Please select
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Please select
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	Please select
CO -	If N, clarify which questions the difference/s relate to	
60 a	and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context to the answers in this section.	
7. KYC.	CDD and EDD	
62	Does the Entity verify the identity of the customer?	Please select
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?	Please select
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Please select
64 b	Expected activity	Please select
64 c	Nature of business/employment	Please select
64 d	Ownership structure	Please select
64 e	Product usage	Please select
64 f	Purpose and nature of relationship	Please select
64 g	Source of funds	Please select
64 h	Source of wealth	Please select
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Please select
65 a1	Are ultimate beneficial owners verified?	Please select
65 b	Authorised signatories (where applicable)	Please select
65 c	Key controllers	Please select
65 d 66	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	Please select Please select
67	Does the due diligence process result in customers receiving a risk classification?	Please select
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Please select
67 a2	Geography	Please select
67 a3	Business Type/Industry	Please select
67 a4	Legal Entity type	Please select
67 a5	Adverse Information	Please select
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Please select
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 68 a4a	Other If yes, please specify "Other"	Please select
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Please select
69 a	If Y, is this at:	
69 a1	Onboarding	Please select
69 a2	KYC renewal	Please select

69 a3	Trigger event	Please select
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Please select
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
71 a	If Y, is this at:	
71 a1	Onboarding	Please select
71 a2	KYC renewal	Please select
71 a3	Trigger event	Please select
72	What is the method used by the Entity to screen PEPs?	Please select
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?	Please select
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Please select
74 a	If yes, select all that apply:	
74 a1	Less than one year	Please select
74 a2	1 – 2 years	Please select
74 a3	3 – 4 years	Please select
74 a4	5 years or more	Please select
74 a5 74 a6	Trigger-based or perpetual monitoring reviews	Please select
75	Other (Please specify) Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Please select
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	Please select
76 b	Respondent Banks	Please select
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Please select
76 c	Embassies/Consulates	Please select
76 d	Extractive industries	Please select
76 e	Gambling customers	Please select
76 f	General Trading Companies	Please select
76 g	Marijuana-related Entities	Please select
76 h	MSB/MVTS customers	Please select
76 i	Non-account customers	Please select
10015		Please select
76 j	Non-Government Organisations	
76 k	Non-resident customers	Please select
76 l	Nuclear power	Please select
76 m	Payment Service Providers	Please select
76 n	PEPs	Please select
76 o	PEP Close Associates	Please select
76 p	PEP Related	Please select
76 q	Precious metals and stones	Please select
76 r	Red light businesses/Adult entertainment	Please select
76 s	Regulated charities	Please select
76 t	Shell banks	Please select
76 u	Travel and Tour Companies	Please select
76 v	Unregulated charities	Please select
	Used Car Dealers	Please select
76 w		
76 x 76 y	Virtual Asset Service Providers Other (specify)	Please select
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	Please select

78 a	If Y indicate who provides the approval:	Please select
79 a	Does the Entity have specific procedures for	Fiedse select
	onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Please select
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Please select
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
82	If appropriate, provide any additional information/context to the answers in this section.	
8. MONIT	ORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Please select
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Please select
84 a	If manual or combination selected, specify what type of transactions are monitored manually	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Please select
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	Datamart and MTS
84 b2	When was the tool last updated?	Please select
84 b3	When was the automated Transaction Monitoring application last calibrated?	Please select
85	Does the Entity have regulatory requirements to report suspicious transactions?	Please select
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Please select
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Please select
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Please select
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Please select
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Please select
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	
0 511	TATE TO A NODA DENOV	
9. PAYMI 92	Does the Entity adhere to the Wolfsberg Group	

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Please select
93 b	Local Regulations	Please select
93 b1	If Y, specify the regulation	Anti-Money Laundering and Counter-Terrorist Financing Ordinance, Cap. 615
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Please select
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Please select
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Please select
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANO	CTIONS	
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?	Please select
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Please select
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Please select
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Please select
102	What is the method used by the Entity for sanctions screening?	Please select
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Please select
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	Please select
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Please select

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

Page 11

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

129	Does the Entity have real time monitoring to detect fraud?	Please select
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?	Please select
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Please select
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.	
Wolfsberg Declaratio		ring or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of
Wolfsberg Declaratio Anti- Mone Banco Bil every effo	Group Correspondent Banking Due Diligence Questionnaire 2023 (CE n Statement (To be signed by Global Head of Correspondent Bank by Laundering, Chief Compliance Officer, Global Head of Financial Ibao Vizcaya Argentaria, S.A. (Financial Institutivat to remain in full compliance with all applicable financial crime laws	ting or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Crimes Compliance OR equivalent) on name) is fully committed to the fight against financial crime and makes s, regulations and standards in all of the jurisdictions in which it does business and holds accounts.
Wolfsberg Declaratio Anti- Mone Banco Bil every effo The Finan	Group Correspondent Banking Due Diligence Questionnaire 2023 (CE n Statement (To be signed by Global Head of Correspondent Bank by Laundering, Chief Compliance Officer, Global Head of Financial Ibao Vizcaya Argentaria, S.A. (Financial Institutivat to remain in full compliance with all applicable financial crime laws	ring or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Crimes Compliance OR equivalent) on name) is fully committed to the fight against financial crime and makes
Wolfsberg Declaratio Anti- Mone Banco Bil every effo The Finan legal and r	Group Correspondent Banking Due Diligence Questionnaire 2023 (CE n Statement (To be signed by Global Head of Correspondent Banking Laundering, Chief Compliance Officer, Global Head of Financial Ibao Vizcaya Argentaria, S.A. (Financial Instituti rt to remain in full compliance with all applicable financial crime laws cial Institution understands the critical importance of having effective gulatory obligations.	ting or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Crimes Compliance OR equivalent) on name) is fully committed to the fight against financial crime and makes s, regulations and standards in all of the jurisdictions in which it does business and holds accounts.
Wolfsberg Declaratio Anti- Mone Banco Bil every effo The Finan legal and r The Finan standards The Finan	Group Correspondent Banking Due Diligence Questionnaire 2023 (CE n Statement (To be signed by Global Head of Correspondent Bank by Laundering, Chief Compliance Officer, Global Head of Financial Ibao Vizcaya Argentaria, S.A. (Financial Institutire to remain in full compliance with all applicable financial crime laws cial Institution understands the critical importance of having effective gulatory obligations.	ting or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Crimes Compliance OR equivalent) on name) is fully committed to the fight against financial crime and makes are regulations and standards in all of the jurisdictions in which it does business and holds accounts. We and sustainable controls to combat financial crime in order to protect its reputation and to meet its against to transactions in international payments and has adopted is committed to adopting these with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles.
Wolfsberg Declaratio Anti- Mone Banco Bil every effo The Finan legal and r The Finan standards The Finan The Inform	Group Correspondent Banking Due Diligence Questionnaire 2023 (CE n Statement (To be signed by Global Head of Correspondent Banking Laundering, Chief Compliance Officer, Global Head of Financial Ibao Vizcaya Argentaria, S.A. (Financial Institutire to remain in full compliance with all applicable financial crime laws cial Institution understands the critical importance of having effective gulatory obligations. cial Institution recognises the importance of transparency regarding the citical Institution further certifies it complies with / is working to complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the complex of the comp	cing or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Crimes Compliance OR equivalent) on name) is fully committed to the fight against financial crime and makes are guilations and standards in all of the jurisdictions in which it does business and holds accounts. The and sustainable controls to combat financial crime in order to protect its reputation and to meet its ag parties to transactions in international payments and has adopted is committed to adopting these by with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles.
Wolfsberg Declaratio Anti- Mone Banco Bil every effo The Finan legal and r The Finan standards The Finan The Finan The Finan the answe	Group Correspondent Banking Due Diligence Questionnaire 2023 (CE n Statement (To be signed by Global Head of Correspondent Banking Laundering, Chief Compliance Officer, Global Head of Financial Ibao Vizcaya Argentaria, S.A. (Financial Institutire to remain in full compliance with all applicable financial crime laws cial Institution understands the critical importance of having effective guiatory obligations. cial Institution recognises the importance of transparency regarding to compliation provided in this Wolfsberg CBDDQ will be kept current and version provided in this Wolfsberg CBDDQ will be kept current and version provided in this Wolfsberg CBDDQ are complete and correct to reprovided in this Wolfsberg CBDDQ are complete and correct to	ting or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Crimes Compliance OR equivalent) on name) is fully committed to the fight against financial crime and makes are regulations and standards in all of the jurisdictions in which it does business and holds accounts. We and sustainable controls to combat financial crime in order to protect its reputation and to meet its g parties to transactions in international payments and has adopted/is committed to adopting these by with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. Will be updated no less frequently than every eighteen months.
Wolfsberg Declaratio Anti- Mone Banco Bil every effo The Finan legal and r The Finan standards The Finan The Inform The Finan	Group Correspondent Banking Due Diligence Questionnaire 2023 (CE n Statement (To be signed by Global Head of Correspondent Bank by Laundering, Chief Compliance Officer, Global Head of Financial Ibao Vizcaya Argentaria, S.A. (Financial Institutire to remain in full compliance with all applicable financial crime laws cial Institution understands the critical importance of having effective egulatory obligations. cial Institution recognises the importance of transparency regarding the compliance of the compliance of transparency regarding the compliance of transparency regarding the compliance of transparency regarding the compliance of transparency regarding to compliance of the compliance of transparency regarding the compliance of transparency regarding to compliance of the compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transparency regarding to compliance of transpa	ting or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Crimes Compliance OR equivalent) on name) is fully committed to the fight against financial crime and makes s, regulations and standards in all of the jurisdictions in which it does business and holds accounts. We and sustainable controls to combat financial crime in order to protect its reputation and to meet its g parties to transactions in international payments and has adopted/is committed to adopting these by with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. It is a timely basis. It a timely basis.

08 January 2024 (Signature & Date)

___ (Signature & Date)

the Wolfsberg Group

Financial Institution Name: Location (Country) :

Banco Bilbao Vizcaya Argentaria S.A Singapore branch

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
I. ENTIT	Y & OWNERSHIP	
	Full Legal Name	Banco Bilbao Vizcaya Argentaria S.A
2	Append a list of foreign branches which are covered by this questionnaire	Singapore branch
3	Full Legal (Registered) Address	80 Raffies Place, #55-02 UOB Plaza 1, Singapore 048624.
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	28/03/2006
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Please select
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mulual	Please select
6 c	Government or State Owned by 25% or more	Please select
6 d	Privately Owned	Please select
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	- Nade datas
7	% of the Entity's total shares composed of bearer shares	
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	Please select
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	Please select
10	Name of primary financial regulator/supervisory authority	Monetary Authority of Singapore
11	Provide Legal Entity Identifier (LEI) if available	
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	



- 10	Jurisdiction of licensing authority and regulator of ultimate parent	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	No
14 b	Private Banking	No
14 c	Commercial Banking	
		Please select
14 d	Transactional Banking	Please select
14 e	Investment Banking	No
14 f	Financial Markets Trading	No
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	Yes
15 a	If Y, provide the top five countries where the non- resident customers are located.	Hong Kong, Australia, Ireland, Saudi Arabia and Netherlands
16	Select the closest value:	
16 a	Number of employees	1-50
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Please select
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	
y av Fig		
y av Fig	information/context to the answers in this section.	
2. PROD	information/context to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and	No
2. PRODI 19	information/context to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking	No
2. PROD	Information/context to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking	No Please select
2. PRODI 19 19 a 19 a 19 a1	information/context to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y	
2. PROD 19 19 a 19 a 19 a1 19 a1a	Information/context to the answers in this section. UCTS & 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	Please select
2. PRODI 19 19 a 19 a 19 a1 19 a1a	Information/context to the answers in this section. UCTS & 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	Please select Please select
2. PRODI 19 19 a 19 a1 19 a1a 19 a1a 19 a1c 19 a1d 19 a1d	Information/context to the answers in this section. UCTS & 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?	Please select Please select Please select
2. PRODI 19 19 a 19 a 19 a 19 a 19 a 10 a 10 a 10 a 10 a 10 a 10 a 10 a 10	Information/context to the answers in this section. UCTS & 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	Please select Please select Please select
2. PRODI 19 19 a 19 a1 19 a1a 19 a1a 19 a1c 19 a1d 19 a1d	Information/context to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks?	Please select Please select Please select Please select Please select
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d	Information/context to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	Please select Please select Please select Please select Please select Please select
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1g	Information/context to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	Please select Please select Please select Please select Please select Please select Please select
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1g 19 a1f	Information/context to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	Please select Please select Please select Please select Please select Please select

Page 2



40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Plaase select
40 с	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Please select
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Please select
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Please select
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Please select
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Please select
42 b	1st Line of Defence	Please select
12 c	2nd Line of Defence	Please select
42 d	3rd Line of Defence	Please select
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Please select
421	Non-employed workers as appropriate (contractors/consultants)	Please select
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Please select
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Picase select
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.	
	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a		
	Money laundering	Please select
46 b	Money laundering Terrorist financing	Please select Please select
46 b		
	Terrorist financing	Please select
46 c	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at	Please select Please select
46 c 47	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and	Please select Please select
46 c 47 48	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:	Please select Please select
46 c 47 48	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	Please select Please select Please select Please select
46 c 47 48 48 a 48 a	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?	Please select Please select Please select Please select Please select
46 c 47 48 48 a 48 a 48 a1 48 b	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	Please select Please select Please select Please select Please select Please select Please select Please select
46 c 47 48 48 a 48 a 48 a 48 b 48 b	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	Please select Please select Please select Please select Please select Please select Please select Please select
46 c 47 48 48 a 48 a 48 a 48 b 48 b 48 b 49	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	Please select Please select Please select Please select Please select Please select Please select Please select Please select
46 c 47 48 48 a 48 a 48 a 48 b 48 b 49 a	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.	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
46 c 47 48 48 a 48 a 48 a 48 b 48 b 49 a 49 b	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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
46 c 47 48 48 a 48 a 1 48 b 48 b 1 49 49 a 49 b	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.	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d	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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d 49 e	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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select

49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Please select
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Please select
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Please select
491	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	Please select
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Please select
49 n	Outline the processes for the maintenance of internal "watchlists"	Please select
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Please select
51	Does the Entity have record retention procedures that comply with applicable laws?	Please select
51 a	If Y, what is the retention period?	Please select
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
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 C	STE & SANCTIONS RISK ASSESSMENT	
6. AML, 0	DOES the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
	Does the Entity's AML & CTF EWRA cover the	Please select
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Please select Please select
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	
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	Please select
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Please select Please select
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Charmel Geography Does the Entity's AML & CTF EWRA cover the	Please select Please select
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: Transaction Monitoring Customer Due Diligence	Please select Please select Please select
54 a 54 b 54 c 54 d 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	Please select Please select Please select Please select
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 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	Please select Please select Please select Please select Please select
54 a 54 a 54 b 54 c 54 d 55 a 55 a 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Charmel 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	Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 e 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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 54 c 55 c 55 a 55 c 55 c 55 c 55 f 55 g	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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 e 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 Geovernance Management Information Has the Entity's AML & CTF EWRA been completed	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	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	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 54 c 55 c 55 a 55 b 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 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.	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 54 c 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 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? 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:	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 54 c 54 c 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Charmel 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	Please select Piease select Please select
54 a 54 a 54 b 54 c 54 c 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 56 a 57 a 57 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Charmel 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	Please select Piease select Please select
54 a 54 a 54 b 54 c 55 c 55 a 55 b 55 c 55 c 55 c 55 c 55 6 55 e 55 f 55 g 55 h 56 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	Please select Piease select Piease select Please select
54 a 54 a 54 b 55 c 55 a 55 c 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 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. 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	Please select Piease select Piease select Please select
54 a 54 a 54 b 54 c 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 57 a 57 a 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. 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:	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select
54 a 54 a 54 b 55 c 55 d 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 c 57 a 57 c 57 d 58 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Charmel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select

19 b	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	Please select
190	Cross-Border Bulk Cash Delivery	Please select
19 c	Cross-Border Remittances	Please select
19 d	Domestic Bulk Cash Delivery	Please select
19 e	Hold Mail	No
19 f	International Cash Letter	Please select
19 g	Low Price Securities	Please select
19 h	Payable Through Accounts	Please select
191	Payment services to non-bank entities who may	
152	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 13	Virtual Asset Service Providers (VASPs)	Please select
19 i4	eCommerce Platforms	Please select
19 i5	Other - Please explain	
19 j	Private Banking	No.
19 k	Remote Deposit Capture (RDC)	Please select
191	Sponsoring Private ATMs	Please select
19 m	Stored Value Instruments	No
19 n	Trade Finance	Please select
19 o	Virtual Assets	Please select
19 р	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	Please select
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	Please select
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	Please select
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	No Walk-in customers for BBVA Singapore branch
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Please select
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,	
21 3. AML, (information/context to the answers in this section. CTF & SANCTIONS PROGRAMME	
21	information/context to the answers in this section,	
21 3. AML, (information/context to the answers in this section, CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the	Please select
3. AML, (information/context to the answers in this section, CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	Please select Please select
21 3. AML, (22 22 a	information/context to the answers in this section. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise	
21 3. AML, (22 22 a 22 b	information/context to the answers in this section. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership	Please select
21 3. AML, (22 22 a 22 b 22 c 22 d	information/context to the answers in this section. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting	Please select Please select
21 3. AML, (22 22 a 22 b 22 c 22 d 22 e	information/context to the answers in this section. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD	Please select Please select Not applicable Please select
21 3. AML, (22 22 a 22 b 22 c 22 d 22 e 22 f	information/context to the answers in this section. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	Please select Please select Not applicable Please select Please select
21 3. AML, (22 22 a 22 b 22 c 22 d 22 e 22 f 22 g	information/context to the answers in this section. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Please select Please select Not applicable Please select Please select Please select
21 3. AML, 0 22 22 a 22 b 22 c 22 d 22 c 22 d 22 e 22 f 22 g 22 h	information/context to the answers in this section. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Please select Please select Not applicable Please select Please select Please select Please select Please select
21 3. AML, 0 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i	information/context to the answers in this section. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Please select Please select Not applicable Please select Please select Please select Please select Please select Please select
21 3. AML, 0 22 22 a 22 b 22 c 22 d 22 c 22 d 22 e 22 f 22 g 22 h	information/context to the answers in this section. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Please select Please select Not applicable Please select Please select Please select Please select Please select

22 m	Suspicious Activity Reporting	Please select
22 n	Training and Education	Please select
22 o	Transaction Monitoring	Please select
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	1-10
24	la the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Please select
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Please select
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Please select
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Please select
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	
4. ANTI	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Please select
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Please select
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Please select
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Please select
34	Is the Entity's ABC programme applicable to:	Please select
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Please select
35 b	Includes enhanced requirements regarding interaction with public officials?	Please select
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Please select
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Please select
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Please select
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Please select
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Enlity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Please select
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Please select
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Please select

58 e	Name Screening	Please select
58 f	Transaction Screening	Please select
58 g	Training and Education	Please select
59	Has the Entity's Sanctions EWRA been completed in	Please select
	the last 12 months?	Fiedse Select
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	Please select
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	CDD and EDD	
62	Does the Entity verify the identity of the customer?	Please select
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?	Please select
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Please select
64 b	Expected activity	Please select
64 c	Nature of business/employment	Please select
64 d	Ownership structure	Please select
64 e	Product usage	Please select
64 f	Purpose and nature of relationship	Please select
64 g	Source of funds	Please select
64 h	Source of wealth	Please select
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Please select
65 a1	Are ultimate beneficial owners verified?	Please select
65 b	Authorised signatories (where applicable)	Please select
65 c	Key controllers	Please select
65 d 66	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	Please select Please select
67	Does the due diligence process result in customers receiving a risk classification?	Please select
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Please select
67 a2	Geography	Please select
67 a3	Business Type/Industry	Please select
67 a4	Legal Entity type	Please select
67 a5	Adverse Information	Please select
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Please select
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 68 a4a	Other If yes, please specify "Other"	Please select
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Please select
69 a	If Y, is this at:	
69 a1	Onboarding	Please select
69 a2	KYC renewal	Please select

70 71	Trigger event What is the method used by the Entity to screen for	Please select
71	Adverse Media/Negative News?	Please select
	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Please select
71 a	If Y, is this at:	
71 a1	Onboarding	Please select
71 a2	KYC renewal	Please select
71 a3	Trigger event	Please select
72	What is the method used by the Entity to screen PEPs?	Please select
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?	Please select
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Please select
74 a	If yes, select all that apply:	
74 a1	Less than one year	Please select
74 a2	1 – 2 years	Please select
74 a3	3 – 4 years	Please select
74 a4	5 years or more	No
74 a5	Trigger-based or perpetual monitoring reviews	Please select
74 a6	Other (Please specify) Does the Entity maintain and report metrics on current	
	and past periodic or trigger event due diligence reviews?	Please select
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	Please select
76 b	Respondent Banks	Please select
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Please select
76 c	Embassies/Consulates	Do not have this category of customer or industry
76 d	Extractive industries	Please select
76 e	Gambling customers	Do not have this category of customer or industry
76 f	General Trading Companies	Please select
76 g	Marijuana-related Entities	
		Do not have this category of customer or industry
76 h	MSB/MVTS customers	Do not have this category of customer or industry
761	Non-account customers	Please saled
76 j	Non-Government Organisations	Do not have this category of customer or industry
76 k	Non-resident customers	Please select
761	Nuclear power	Do not have this category of customer or industry
76 m	Payment Service Providers	Do not have this category of customer or industry
76 n	PEPs	Do not have this category of customer or industry
76 o	PEP Close Associates	Do not have this category of customer or industry
76 p	PEP Related	Do not have this category of customer or industry
76 q	Precious metals and stones	Please select
76 r	Red light businesses/Adult entertainment	Do not have this category of customer or industry
76 s	Regulated charities	Do not have this category of customer or industry
76 t	Shell banks	Please select
76 u	Travel and Tour Companies	Do not have this category of customer or industry
	A La Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract of the Contract	
76 v	Unregulated charities	Do not have this category of customer or industry
76 w	Used Car Dealers	Do not have this category of customer or industry
76 x 76 y	Virtual Asset Service Providers Other (specify)	Do not have this category of customer or industry
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	Please select



78 a	If Y indicate who provides the approval:	Please select
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	No
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Please select
31	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
81 a	If N, clarify which questions the difference/s relate to and the branch/co that this applies to	79 - Singapore branch is in to wholesale corporate banking activities and we do not have lawyers, accountants, consultants and real estate agents as customers.
32	If appropriate, provide any additional information/context to the answers in this section,	
8. MONI	TORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Please select
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	Trade Finance related transactions are monitored for suspicious activity by - subjecting the bills of lading to sample verification - monitoring the vessel voyage from port of loading until port of discharge - subjecting the counter party to pre-clearance process before accepting the transaction
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Please select
84 b1	If 'Vendor-sourced tool' or 'Roth' selected, what is the name of the vendor/tool?	
84 b2	When was the tool last updated?	Please select
84 b3	When was the automated Transaction Monitoring application last calibrated?	Please select
85	Does the Entity have regulatory requirements to report suspicious transactions?	Please select
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Please select
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Please select
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Please select
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Please select
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Please select
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	Combination of manual and automated is for name screening, Manual for identifying suspicious activities
91	If appropriate, provide any additional information/context to the answers in this section.	
	MENT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Please select

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Please select
93 b	Local Regulations	Please select
93 b1	If Y, specify the regulation	MAS Notice 626 - Paragraph 11
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Plaase select
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Please select
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Please select
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC	TIONS	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Please select
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Please select
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Please select
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Please select
102	What is the method used by the Entity for sanctions screening?	Both Automated and Manual
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of yendor-sourced tools used?	Please select
102 a1a	If a 'vendor-sourced lool' or 'both' selected, what is the name of the vendor/lool?	
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	Fleque select
103	Does the Entity screen all sanctions relevant data including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Pleasa salect

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Please select
06	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
06 a	Consolidated United Nations Security Council Sanctions List (UN)	Please select
06 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Please select
06 с	Office of Financial Sanctions Implementation HMT (OFSI)	Please select
06 d	European Union Consolidated List (EU)	Please select
06 e	Lists maintained by other G7 member countries	Please select
106 f	Other (specify)	MAS Alert List and Payment blocking under Gambling Control Act Order 2023
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	Please select
107 b	Transactions	Please select
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?	Please select
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
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.	
	ING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Please select
111 Ь	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Please select
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Please select
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Please select
111 e	Conduct and Culture	Please select
111 f	Fraud	Please select
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	Please select
112 b	1st Line of Defence	Please select
112 c	2nd Line of Defence	Please select
112 d	3rd Line of Defence	Please select
112 e	Third parties to which specific FCC activities have been outsourced	Please select
112 f	Non-employed workers (contractors/consultants)	Please select
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Please select
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Please select
114 a	If Y, how frequently is training delivered?	Please select
115	Confirm that all responses provided in the above	Disassipplied
	Section are representative of all the LE's branches	Please select



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

130	Does the Entity have real time monitoring to detect fraud?	Please select
	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Please select
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Please select
131 а	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	
every effor The Financ legal and re The Financ	t to remain in full compliance with all applicable financial crime law cial Institution understands the critical importance of having effecti egulatory obligations. cial Institution recognises the importance of transparency regarding	tion name) is fully committed to the fight against financial crime and makes is, regulations and standards in all of the jurisdictions in which it does business and holds accounts, iver and sustainable controls to combat financial crime in order to protect its reputation and to meet its and parties to transactions in international payments and has adopted/is committed to adopting these
The Finance legal and re The Finance standards.	t to remain in full compliance with all applicable financial crime law cial Institution understands the critical importance of having effect egulatory obligations. cial Institution recognises the importance of transparency regarding	ive and sustainable controls to combat financial crime in order to protect its reputation and to meet its ing and sustainable controls to combat financial crime in order to protect its reputation and to meet its ing parties to transactions in international payments and has adopted is committed to adopting these only with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles.
every effor The Financ legal and re The Financ standards. The Financ The Inform	to remain in full compliance with all applicable financial crime law cial Institution understands the critical importance of having effect egulatory obligations. cial Institution recognises the importance of transparency regarding the statution further certifies it complies with / is working to come	ive and sustainable controls to combat financial crime in order to protect its reputation and to meet its ing parties to transactions in international payments and has adopted/is committed to adopting these only with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles.
The Finance standards. The Finance standards. The Finance The Information The Finance The Information The Finance In Danielle	to remain in full compliance with all applicable financial crime law itial Institution understands the critical importance of having effect agulatory obligations. cial Institution recognises the importance of transparency regardical Institution further certifies it complies with / is working to compation provided in this Wolfsberg CBDDQ will be kept current and the Institution commits to file accurate supplemental information of a Savira	ive and sustainable controls to combat financial crime in order to protect its reputation and to meet its ing parties to transactions in international payments and has adopted/is committed to adopting these only with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles.
every effor The Financ legal and re The Financ The Financ The Inform The Financ I, Danielle the answel Institution.	to remain in full compliance with all applicable financial crime law sial Institution understands the critical importance of having effect gulatory obligations. It is institution recognises the importance of transparency regarding in the compliance of transparency regarding in the com	is, regulations and standards in all of the jurisdictions in which it does business and holds accounts, in and sustainable controls to combat financial crime in order to protect its reputation and to meet its ing parties to transactions in international payments and has adopted its committed to adopting these ally with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles, will be updated no less frequently than every eighteen months. In a timely basis. In Correspondent Banking or equivalent), certify that I have read and understood this declaration, that only honest belief, and that I am authorized to execute this declaration on behalf of the Financial divalent), certify that I have read and understood this declaration, that
every effor The Financ legal and re The Financ The Financ The Inform The Financ I, Danielle the answel Institution.	to remain in full compliance with all applicable financial crime law sial Institution understands the critical importance of having effect gulatory obligations. It is institution recognises the importance of transparency regarding in the compliance of transparency regarding in the com	regulations and standards in all of the jurisdictions in which it does business and holds accounts, ive and sustainable controls to combat financial crime in order to protect its reputation and to meet its and parties to transactions in international payments and has adopted/is committed to adopting these by with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles, will be updated no less frequently than every eighteen months. In a timely basis.
every effor The Financ legal and re The Financ The Financ The Inform The Financ I, Danielle the answel Institution.	to remain in full compliance with all applicable financial crime law sial Institution understands the critical importance of having effect gulatory obligations. It is institution recognises the importance of transparency regarding in the compliance of transparency regarding in the com	ive and sustainable controls to combat financial crime in order to protect its reputation and to meet its ing parties to transactions in international payments and has adopted/is committed to adopting these by with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles, will be updated no less frequently than every eighteen months. In a timely basis. In Correspondent Banking or equivalent), certify that I have read and understood this declaration, that only honest belief, and that I am authorised to execute this declaration on behalf of the Financial livitation, that the answers provided in this am authorised to execute this declaration, that the answers provided in this am authorised to execute this declaration on behalf of the Financial Institution.





Financial Institution Name: Location (Country) :

BANCO BILBAO VIZCAYA ARGENTARIA SA FRANCE

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 at me 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	BANCO BILBAO VIZCAYA ARGENTARIA SA French Branch
2	Append a list of foreign branches which are covered by this questionnaire	French Branch
3	Full Legal (Registered) Address	29 Avenue de l'Opéra 75001 Paris - FRANCE
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	1902
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Please select
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	Please select
6 c	Government or State Owned by 25% or more	Please select
6 d	Privately Owned	Please select
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	Please select
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	Please select
10	Name of primary financial regulator/supervisory authority	Banque de France / ACPR (Autorité de Contrôle Prudentiel et de Résolution
11	Provide Legal Entity Identifier (LEI) if available	894500U247KEMA0HHP26
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	

13		
	Jurisdiction of licensing authority and regulator of	
	ultimate parent	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	No
14 b	Private Banking	No
14 c	Commercial Banking	Please select
14 d	Transactional Banking	Please select
14 e	Investment Banking	
14 f		Please select
Market A.	Financial Markets Trading	Please select
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	Please select
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	
15	Doos the Entity have a cignificant (10% or more)	
13	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive	
	more than 10% of its revenue from non-resident	
	customers? (Non-resident means customers primarily	Please select
	resident in a different jurisdiction to the location	
	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	F4 000
16 b	Total Assets	51-200
1000000		Please select
17	Confirm that all responses provided in the above	Please select
	Section are representative of all the LE's branches.	
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional	
	information/context to the answers in this section.	
DRODU	JCTS & SERVICES	
2. PRODU 19	Does the Entity offer the following products and	
19		
	services:	
	Correspondent Banking	Mary Company C
19 a		No
19 a1	IfY	No
	If Y Does the Entity offer Correspondent Banking	
19 a1	IfY	No Please select
19 a1	If Y Does the Entity offer Correspondent Banking	Please select
19 a1 19 a1a	If Y Does the Entity offer Correspondent Banking services to domestic banks?	
19 a1 19 a1a 19 a1b	If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships?	Please select
19 a1 19 a1a	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	Please select Please select
19 a1 19 a1a 19 a1b	If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with	Please select
19 a1 19 a1a 19 a1b 19 a1c	If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Please select Please select
19 a1 19 a1a 19 a1b	If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking	Please select Please select Please select
19 a1 19 a1a 19 a1b 19 a1c	If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks?	Please select Please select
19 a1 19 a1a 19 a1b 19 a1c	If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships	Please select Please select Please select Please select
19 a1 19 a1a 19 a1b 19 a1c 19 a1d	If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks?	Please select Please select Please select
19 a1 19 a1a 19 a1b 19 a1c	If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? 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?	Please select Please select Please select Please select
19 a1 19 a1a 19 a1b 19 a1c 19 a1d	If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks?	Please select Please select Please select Please select
19 a1 19 a1a 19 a1b 19 a1c 19 a1d	If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks?	Please select Please select Please select Please select Please select
19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e	If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Please select Please select Please select Please select Please select Please select
19 a1 19 a1a 19 a1b 19 a1c 19 a1d	If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking	Please select Please select Please select Please select Please select Please select Please select
19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e	If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity 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	Please select Please select Please select Please select Please select
19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f	If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity forer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	Please select Please select Please select Please select Please select Please select Please select
19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e	If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships	Please select Please select Please select Please select Please select Please select Please select
19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f	If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	Please select Please select Please select Please select Please select Please select Please select
19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f	If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	Please select Please select Please select Please select Please select Please select Please select
19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f 19 a1g	If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	Please select Please select Please select Please select Please select Please select Please select
19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f	If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	Please select Please select Please select Please select Please select Please select Please select Please select

	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	No
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Please select
19 d	Domestic Bulk Cash Delivery	Please select
19 e	Hold Mail	No No
19 f	International Cash Letter	
TACHOLY		Please select
19 g	Low Price Securities	No
19 h	Payable Through Accounts	Please select
19 i	Payment services to non-bank entities who may 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	No
19 k	Remote Deposit Capture (RDC)	Please select
191	Sponsoring Private ATMs	Please select
	Stored Value Instruments	
19 m		No .
19 n	Trade Finance	Please select
19 o	Virtual Assets	Please select
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	Please select
19 p2	Wire transfers	Please select
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p3	Foreign currency conversion	Please select
19 p3a	If yes, state the applicable level of due diligence	Please select
19 p4	Sale of Monetary Instruments	Please select
19 p4a	If yes, state the applicable level of due diligence	Please select
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	N/A
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Please select
20 20 a		Please select
	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to	Please select
20 a 21 3. AML, C	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Please select
20 a 21 3. AML, C 22	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	Please select
20 a 21 3. AML, C	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the	Please select Please select
20 a 21 3. AML, C 22	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
20 a 21 3. AML, C 22	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise	Please select
20 a 21 3. AML, C 22 22 a 22 b 22 c	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership	Please select Please select Please select
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting	Please select Please select Please select Not applicable
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 e	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD	Please select Please select Please select Not applicable Please select
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 e 22 f	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	Please select Please select Please select Not applicable Please select Please select
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 c 22 d 22 e 22 f 22 g	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Please select Please select Please select Not applicable Please select Please select Please select Please select
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 e 22 f	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	Please select Please select Please select Not applicable Please select Please select
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 c 22 d 22 e 22 f 22 g	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Please select Please select Please select Not applicable Please select Please select Please select Please select
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. IF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review	Please select Please select Please select Not applicable Please select Please select Please select Please select Please select Please select Please select
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review Policies and Procedures	Please select Please select Please select Not applicable Please select Please select Please select Please select Please select Please select Please select Please select

22	Suspicious Activity Paparting	Places select
22 m	Suspicious Activity Reporting	Please select
22 n 22 o	Training and Education Transaction Monitoring	Please select
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	Please select 1-10
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Please select
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Please select
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Please select
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Please select
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	
4. ANTI	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Please select
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Please select
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Please select
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Please select
34	Is the Entity's ABC programme applicable to:	Please select
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Please select
35 b	Includes enhanced requirements regarding interaction with public officials?	Please select
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Please select
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Please select
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Please select
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Please select
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Please select
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Please select
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Please select

40 b	Corruption risks associated with the countries and	
	industries in which the Entity does business, directly or through intermediaries	Please select
40 с	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Please select
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Please select
40 e	Changes in business activities that may materially increase the Entity's corruption risk	No
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Please select
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Please select
42 b	1st Line of Defence	Please select
42 c	2nd Line of Defence	Please select
42 d	3rd Line of Defence	Please select
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	No
42 f	Non-employed workers as appropriate (contractors/consultants)	No
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Please select
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
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.	
	TE & CANOTIONS BOULDIES & BROOFFILIER	
5. AML, 0	CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Please select
46 b	Terrorist financing	Please select
46 c	Sanctions violations	Please select
47	Are the Entity's policies and procedures updated at least annually?	Please select
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	Please select
48 a1	If Y, does the Entity retain a record of the results?	Please select
48 b	EU Standards	Please select
48 b1	If Y, does the Entity retain a record of the results?	Please select
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Please select
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Please select
49 с	Prohibit dealing with other entities that provide banking services to unlicensed banks	Please select
49 d	Prohibit accounts/relationships with shell banks	Please select
49 е	Prohibit dealing with another entity that provides services to shell banks	Please select
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Please select
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Please select
49 h	Assess the risks of relationships with domestic and	

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

58 e	Name Screening	In.
58 f	Transaction Screening	Please select
2000		Please select
58 g	Training and Education	Please select
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Please select
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	Please select
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,	CDD and EDD	
62	Does the Entity verify the identity of the customer?	Please select
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?	Please select
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Please select
64 b	Expected activity	Please select
64 c	Nature of business/employment	Please select
64 d	Ownership structure	Please select
64 e	Product usage	Please select
64 f	Purpose and nature of relationship	Please select
64 g	Source of funds	Please select
64 h	Source of wealth	Please select
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Please select
65 a1	Are ultimate beneficial owners verified?	Please select
65 b	Authorised signatories (where applicable)	Please select
65 c	Key controllers	Please select
65 d 66	Other relevant parties What is the Entity's minimum (lowest) threshold	Please select Please select
67	applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification?	Please select
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Please select
67 a2	Geography	Please select
67 a3	Business Type/Industry	Please select
67 a4	Legal Entity type	Please select
67 a5	Adverse Information	Please select
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Please select
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 68 a4a	Other If yes, please specify "Other"	Please select
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Please select
69 a 69 a1	If Y, is this at:	Disconsist
THE SOUND THE THE	Onboarding	Please select
69 a2	KYC renewal	Please select

60.0	I Tilman avant	Plane select
69 a3	Trigger event What is the method used by the Entity to screen for	Please select
	Adverse Media/Negative News?	Please select
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?	Please select
71 a	If Y, is this at:	
71 a1	Onboarding	Please select
71 a2	KYC renewal	Please select
71 a3	Trigger event	Please select
73	What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes	Please select
	to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Please select
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Please select
74 a	If yes, select all that apply:	
74 a1	Less than one year	Please select
74 a2 74 a3	1 – 2 years	Please select
74 a3	3 – 4 years 5 years or more	Please select Please select
74 a5	Trigger-based or perpetual monitoring reviews	Please select
74 a6	Other (Please specify)	T lease delex
	Cuter (i lease specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Please select
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	Do not have this category of customer or industry
76 b	Respondent Banks	Do not have this category of customer or industry
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Please setect
76 c	Embassies/Consulates	Do not have this category of customer or industry
76 d	Extractive industries	No EDD/restriction or prohibition
76 e	Gambling customers	Do not have this category of customer or industry
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Do not have this category of customer or industry
76 h	MSB/MVTS customers	Do πot have this category of customer or industry
76 i	Non-account customers	Do not have this category of customer or industry
76 j	Non-Government Organisations	Do not have this category of customer or industry
76 k	Non-resident customers	Please select
761	Nuclear power	Do not have this category of customer or industry
76 m	Payment Service Providers	Do not have this category of customer or industry
76 n	PEPs	Do not have this category of customer or industry
76 o	PEP Close Associates	Please select
76 p	PEP Related	Please select
76 q	Precious metals and stones	Do not have this category of customer or industry
76 r	Red light businesses/Adult entertainment	Do not have this category of customer or industry
76 s	Regulated charities	Do not have this category of customer or industry
76 t	Shell banks	Do not have this category of customer or industry
76 u	Travel and Tour Companies	Please select
76 v	Unregulated charities	Do not have this category of customer or industry
76 w	Used Car Dealers	Do not have this category of customer or industry
76 x 76 y	Virtual Asset Service Providers Other (specify)	Do not have this category of customer or industry
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	Please select

78 a 79	If Y indicate who provides the approval: Does the Entity have specific procedures for	Please select
	onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	No
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Please select
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
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.	We identify beneficial owners according to the requirements of French legislation.
8. MONI	TORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Please select
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Please select
84 a	If manual or combination selected, specify what type of transactions are monitored manually	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Please select
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	Datamart / MTS
84 b2	When was the tool last updated?	Other - Please explain (in Question 91)
84 b3	When was the automated Transaction Monitoring application last calibrated?	Please select
85	Does the Entity have regulatory requirements to report suspicious transactions?	Please select
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Please select
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Please select
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Please select
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Please select
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Please select
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	Tools are maintained and updated by from the parent Company
9. PAYM 92	Does the Entity adhere to the Wolfsberg Group	

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Please select
93 b	Local Regulations	Please select
93 b1	If Y, specify the regulation	T NOOSO CONTON
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Please select
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Please select
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Please select
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANO	L CTIONS	
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?	Please select
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Please select
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Please select
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Please select
102	What is the method used by the Entity for sanctions screening?	Please select
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Please select
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/lool?	
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	Please select
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Please select
104	What is the method used by the Entity?	Please select

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Please select
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Please select
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Please select
106 с	Office of Financial Sanctions Implementation HMT (OFSI)	Please select
106 d	European Union Consolidated List (EU)	Please select
106 e	Lists maintained by other G7 member countries	Please select
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	Please select
107 b	Transactions	Please select
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?	Please select
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Please select
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.	
	ING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Please select
111 Ь	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Please select
111 с	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Please select
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Please select
111 e	1 0 1 1 10 1	Disease relief
	Conduct and Culture	Please select
111 f	Fraud	Please select
111 f 112	Fraud Is the above mandatory training provided to:	Please select
111 f 112 112 a	Fraud Is the above mandatory training provided to: Board and Senior Committee Management	Please select Please select
111 f 112 112 a 112 b	Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence	Please select Please select Please select
111 f 112 112 a	Fraud Is the above mandatory training provided to: Board and Senior Committee Management	Please select Please select Please select Please select
111 f 112 112 a 112 b 112 c	Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence	Please select Please select Please select
111 f 112 112 a 112 b 112 c 112 d	Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have	Please select Please select Please select Please select Please select Please select
111 f 112 112 a 112 b 112 c 112 d 112 e	Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and	Please select Please select Please select Please select Please select Please select Please select Please select
111 f 112 112 a 112 b 112 c 112 d 112 e	Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training	Please select Please select Please select Please select Please select Please select Please select Please select
111 f 112 112 a 112 b 112 c 112 d 112 e 112 f 113	Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities? Does the Entity provide customised training for AML,	Please select Please select Please select Please select Please select Please select Please select Please select Please select

## Appropriate, provide any additional intermediate for the properties of the properties of the properties of the properties of the properties of the properties of the properties of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the provided of the prov			
Information/context to the answers in this section. 117 Does the Entity have a program wide risk based Coatily Assurance programs for foundal crime (separate from the Independent Auff Indicator)? 118 Does the Entity have a program wide risk based (response from the Entity have a program wide risk based independent Auff Indicator)? 119 Coatin mail all responses provided in the above Section are representative of all the LEs branches 119 a. If Indiant which questions the differences relate to and the branches that this applies to. 119 a. If Indiant which questions the differences relate to and the branches that this applies to. 119 a. If Indiant which questions the differences relate to and the branches that this applies to. 119 a. If Indiant which questions the differences relate to and the branches that this applies to. 119 a. If Indiant which questions the differences relate to and the branches that this applies to. 119 a. If Indiant which questions the differences relate to and the branches that this applies to. 110 If appropriate, provide any additional entities and an internal audit function, a testing function or other independent provides on a regular basis? 110 Indiant which questions the section of the independent provides on a regular basis? 111 Indiant which questions are provided in the applications of the first provides and searches policies and procedures are provided and searches policies and procedures are provided and searches policies and procedures are provided and searches policies and procedures are provided and searches policies and procedures are provided and searches policies and procedures are procedures. 112 a. Matter of the provides are provided and procedures are procedures. 112 a. Matter of the provided and searches policies and procedures are procedures. 112 a. Franches and the provided and searches policies and procedures. 112 a. Searches and the provided and searches policies and procedures. 112 a. Franches and the provided and the above sociou are representative o	115 a		
Does the Entity have a program wide risk based Causily Assurance programs for faminatic arine (separate from the independent Audit function)?	116		
117 Does the Entity have a program wide risk based Quality Assarance programs for flame facility in the program wide risk based (separate from the independent Audit function)? 118 Does the Entity have a program wide risk based compliance Testing process (separate from the independent Audit function)? 119 Section are representative of all the site branches of the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the program wide risk based on the progr	12. QUALITY	I 'ASSURANCE /COMPLIANCE TESTING	
Compliance Testing process (separate from the independent Audit function)? 119 Confirm that all responses provided in the above Section are representative of all the LES branches 119 a If N, clarify which questions the difference's relate to and the branchies that this applies to. 120 If appropriets, provide any additional information/contact to the answers in this section. 137, AUDIT 121 In addition to inspections by the government supervisors/regulators, does the Entily have an inferral audit function a sesting function or other independent information and services on a regular basis? 122 Per provide any additional information and the provide and Sencitions policies and practices on a regular basis? 123 Per provide the provided of the AMIL CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? 124 Per profine it the Entity sudded on the AMIL CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? 125 Per provide and Sanctions policies and process on a regular basis? 126 Per provide and Sanctions policies and process on a regular basis? 127 Per provide and services provided on the reference to the provided provided and services provided any additional information and the procedures are provided any additional information and the provided and procedures are provided any additional information provided any additional information and the branchies that has publicated in the above section are representative of all the LES branches and the branchies that has publicated in the above section are representative of all the LES branches and the branchies that has publicated in the above section are representative of all the LES branches and the branchies that his applies to. 126 Please select 127 Confirm that all regionases provided in the above section are representative of all the LES branches and the branchies that this applies to.		Does the Entity have a program wide risk based Quality Assurance programme for financial crime	Please select
Section are representative of all the LE's branches Please select	118	Compliance Testing process (separate from the	Please select
and the branches that this applies to. I appropriate, provide any additional information/context to the answers in this section.	119		Please select
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In addition to inspections by the government supervisor/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AMIL, 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 Internal Audit Department Please select 124 External Third Party Please select 125 External Third Party Please select 126 External Third Party Please select 127 Internal Audit Department Please select 128 Dest he Internal audit function or other independent third party cover the following areas: 129 Please select 120 External Third Party Please select 121 Dest he Internal Audit Department Please select 122 Dest he Internal Audit Selection Please select 123 Dest Please select 124 Reporting/Metrics & Management Please select 125 Dest Please select 126 Please select 127 Please select 128 Dest Please select 129 Please select 129 Please select 120 Please select 121 Transaction Monitoring Please select 122 Dest Please select 123 Dest Please select 124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completioness? 126 Confirm that all responses provided in the above selection are representative of all the LE's branches 127 Confirm that all responses provided in the above section are representative of all the LE's branches 127 In Appropriate, provide any additional information/context to the answers in this section.	13. AUDIT		
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122 b External Third Party Please select	122		
123 Does the internal audit function or other independent third party cover the following areas: 123 a AML, CTF, ABC, Fraud and Sanctions policy and procedures 123 b Enterprise Wide Risk Assessment Please select 123 c Governance Please select 123 d KYC/CDD/EDD and underlying methodologies Please select 123 e Name Screening & List Management Please select 123 f Reporting/Metrics & Management Information Please select 123 g Suspicious Activity Filling Please select 123 h Technology Please select 123 i Transaction Monitoring Please select 123 i Transaction Screening including for sanctions Please select 123 i Transaction Screening including for sanctions Please select 123 i Transaction Screening including for sanctions Please select 123 i Transaction Monitoring Please select 123 i Transaction Monitoring Please select 123 i Transaction Monitoring Please select 123 i Transaction Monitoring Please select 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 LEs branches 125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 126 If appropriate, provide any additional information/context to the answers in this section.	LIFE CO. CO.	1.000 00 100 100 100 100 100 100 100 100	Please select
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123 I Transaction Monitoring Please select 123 J Transaction Screening including for sanctions Please select 123 K Training & Education Please select 123 Cother (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 125 If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 126 If appropriate, provide any additional information/context to the answers in this section. 127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible	123 g		Please select
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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 125 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 17 Does the Entity have policies in place addressing fraud risk? 18 Does the Entity have a dedicated team responsible			
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Does the Entity have policies in place addressing fraud risk? Please select	126		
Does the Entity have policies in place addressing fraud risk? Please select	14. FRAUE		
	127	Does the Entity have policies in place addressing	Please select
	128		Please select

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

129	Does the Entity have real time monitoring to detect fraud?	Please select
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?	Please select
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Please select
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.	
Declarat	tion Statement	
Wolfsberg (Declaration	Group Correspondent Banking Due Diligence Questionnaire 2023 (CE	king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head

Banco Bilbao Vizcaya Argentaria S.A (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. Banco Bilbao Vizcaya Argentaria S.A The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations. The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards. The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months. The Financial Institution commits to file accurate supplemental information on a timely basis. (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution. Luis López González (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 try honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution. 12/12/2023 ignature & Date)

(Signature & Date)



Financial Institution Name:	
Location (Country) :	

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	
2	Append a list of foreign branches which are covered	
	by this questionnaire	
3	Full Legal (Registered) Address	
	an Logar (regionarou) / nauross	
4	Full Primary Business Address (if different from	
4	above)	
	above)	
5	Date of Entity incorporation/establishment	
6	Select type of ownership and append an ownership	
	chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	
6 b	Member Owned/Mutual	
6 c	Government or State Owned by 25% or more	
6 d	Privately Owned	
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer	
	shares	
8	Does the Entity, or any of its branches, operate under	
	an Offshore Banking License (OBL)?	
8 a	If Y, provide the name of the relevant branch/es	
o a	which operate under an OBL	
	million operate and all object	
0	Does the Bank have a Virtual Bank License or	
9	provide services only through online channels?	
40		
10	Name of primary financial regulator/supervisory authority	
	authority	
11	Provide Legal Entity Identifier (LEI) if available	
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	
	1	l .

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

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	
19 c	Cross-Border Remittances	
19 d	Domestic Bulk Cash Delivery	
19 e	Hold Mail	
19 f	International Cash Letter	
19 g	Low Price Securities	
19 h	Payable Through Accounts	
19 i	Payment services to non-bank entities who may	
	then offer third party payment services to their customers?	
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	
19 j	Private Banking	
19 k	Remote Deposit Capture (RDC)	
19 I	Sponsoring Private ATMs	
19 m	Stored Value Instruments	
19 n	Trade Finance	
19 o	Virtual Assets	
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	
19 p4a 19 p5	If yes, state the applicable level of due diligence If you offer other services to walk-in customers	
19 þ5	please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	
3. AML, C	TF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum	
	AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	
22 b	Adverse Information Screening	
22 c	Beneficial Ownership	
22 d	Cash Reporting	
22 e	CDD	
22 f	EDD	
22 g	Independent Testing	
22 h	Periodic Review	
22 i	Policies and Procedures	
22 j	PEP Screening	
22 k	Risk Assessment	
22 I	Sanctions	

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components detailed below: 40 a Potential liability created by intermediaries and		is the net result of the controls effectiveness and the inherent risk assessment?	
		components detailed below:	
	40 a		

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	
40 с	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	
40 e	Changes in business activities that may materially increase the Entity's corruption risk	
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	
42 b	1st Line of Defence	
42 c	2nd Line of Defence	
42 d	3rd Line of Defence	
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	
42 f	Non-employed workers as appropriate (contractors/consultants)	
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
5. AML, C	TF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	
46 b	Terrorist financing	
46 c	Sanctions violations	
47	Are the Entity's policies and procedures updated at least annually?	
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	
48 b1	If Y, does the Entity retain a record of the results?	
48 b1 49	If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that:	
48 b1	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	
48 b1 49	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	
48 b1 49 49 a	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	
48 b1 49 49 a 49 b	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	
48 b1 49 49 a 49 b 49 c 49 d	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	
48 b1 49 49 a 49 b 49 c 49 d 49 e	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	
48 b1 49 49 a 49 b 49 c 49 d 49 e	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 NBFls Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities	
48 b1 49 49 a 49 b 49 c 49 d 49 e	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 NBFls Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for	

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

58 e	Name Screening	
58 f	Transaction Screening	
58 g	Training and Education	
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	
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	
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?	
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?	
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	
64 b	Expected activity	
64 c	Nature of business/employment	
64 d	Ownership structure	
64 e	Product usage	
64 f	Purpose and nature of relationship	
64 g	Source of funds	
64 h	Source of wealth	
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	
65 a1	Are ultimate beneficial owners verified?	
65 b		
	Authorised signatories (where applicable)	
65 c	Key controllers	
65 d	Other relevant parties	
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	
67	Does the due diligence process result in customers receiving a risk classification?	
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	
67 a2	Geography	
67 a3	Business Type/Industry	
67 a4	Legal Entity type	
67 a5	Adverse Information	
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	
68 a	If Y, is this at:	
68 a1	Onboarding	
68 a2	KYC renewal	
68 a3	Trigger event	
68 a4	Other	
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	
69 a	If Y, is this at:	
69 a1	Onboarding	
69 a2	KYC renewal	

69 a3	Trigger event	
69 a3 70	Trigger event	
	What is the method used by the Entity to screen for Adverse Media/Negative News?	
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
71 a	If Y, is this at:	
71 a1	Onboarding	
71 a2	KYC renewal	
71 a3	Trigger event	
72	What is the method used by the Entity to screen PEPs?	
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	
74 a	If yes, select all that apply:	
74 a1	Less than one year	
74 a2	1 – 2 years	
74 a3	3 – 4 years	
74 a4 74 a5	5 years or more Trigger-based or perpetual monitoring reviews	
74 a5 74 a6	Other (Please specify)	
7440	Outer (Frease specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	
76 b	Respondent Banks	
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	
76 d	Extractive industries	
76 e	Gambling customers	
76 f	General Trading Companies	
76 g	Marijuana-related Entities	
76 h	MSB/MVTS customers	
76 i	Non-account customers	
76 j	Non-Government Organisations	
76 k	Non-resident customers	
76 I	Nuclear power	
76 m	Payment Service Providers	
76 n	PEPs	
76 o	PEP Close Associates	
76 p	PEP Related	
76 q	Precious metals and stones	
76 r	Red light businesses/Adult entertainment	
76 s	Regulated charities	
76 t	Shell banks	
76 u	Travel and Tour Companies	
76 v	Unregulated charities	
76 w	Used Car Dealers	
76 x 76 y	Virtual Asset Service Providers Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	

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

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
00 -	'	
93 a	FATF Recommendation 16	
93 b	Local Regulations	
93 b1	If Y, specify the regulation	
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC	TIONS	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	
102	What is the method used by the Entity for sanctions screening?	
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	
104	What is the method used by the Entity?	

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

115 а	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
12. QUALI	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based	
	Quality Assurance programme for financial crime (separate from the independent Audit function)?	
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
13. AUDIT		
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	
122 b	External Third Party	
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	
123 b	Enterprise Wide Risk Assessment	
123 c 123 d	Governance KYC/CDD/EDD and underlying methodologies	
123 u	Name Screening & List Management	
123 f	Reporting/Metrics & Management Information	
123 g	Suspicious Activity Filing	
123 h	Technology	
123 i	Transaction Monitoring	
123 j	Transaction Screening including for sanctions	
123 k 123 l	Training & Education Other (specify)	
1231	Outer (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	
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. FRAU	סנ	
127	Does the Entity have policies in place addressing fraud risk?	
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	
	•	

129	Does the Entity have real time monitoring to detect fraud?		
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?		
131	Confirm that all responses provided in the above section are representative of all the LE's branches		
131 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.		
<u>Declarat</u>	tion 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)			
every effort		on name) is fully committed to the fight against financial crime and makes regulations and standards in all of the jurisdictions in which it does business and holds accounts.	
	ial Institution understands the critical importance of having effective egulatory obligations.	e and sustainable controls to combat financial crime in order to protect its reputation and to meet its	
The Financ standards.	ial Institution recognises the importance of transparency regarding	parties to transactions in international payments and has adopted/is committed to adopting these	
	ial Institution further certifies it complies with / is working to comply ation provided in this Wolfsberg CBDDQ will be kept current and wi	with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. Il be updated no less frequently than every eighteen months.	
The Financ	ial Institution commits to file accurate supplemental information on	a timely basis.	
I, the answer Institution.		Correspondent Banking or equivalent), certify that I have read and understood this declaration, that my honest belief, and that I am authorised to execute this declaration on behalf of the Financial	
I,		ralent), certify that I have read and understood this declaration, that the answers provided in this mauthorised to execute this declaration on behalf of the Financial Institution.	
	(Signature & Date)	
	(Signature & Date		
		,	