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 | |
| 14 a Retail Banking Yes 14 b Private Banking Yes 14 c Commercial Banking Yes 14 d Transactional Banking Yes | |
| 14 a Retail Banking Yes 14 b Private Banking Yes 14 c Commercial Banking Yes 14 d Transactional Banking Yes | |
| 14 a Retail Banking Yes 14 b Private Banking Yes 14 c Commercial Banking Yes 14 d Transactional Banking Yes | |
| 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: | |
| 1 1 | |
| | · · · · · · · · · · · · · · · · · · · |
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| 19 a Correspondent Banking Yes 19 a1 If Y 19 a1a Does the Entity offer Correspondent Banking | |
| 19 a Correspondent Banking Yes 19 a1 If Y | |
| 19 a Correspondent Banking Yes 19 a1 If Y 19 a1a Does the Entity offer Correspondent Banking services to domestic banks? 19 a1b Does the Entity allow domestic bank clients to | |
| 19 a Correspondent Banking Yes 19 a1 If Y | |
| 19 a Correspondent Banking Yes 19 a1 If Y 19 a1a Does the Entity offer Correspondent Banking services to domestic banks? 19 a1b Does the Entity allow domestic bank clients to provide downstream relationships? Yes | |
| 19 a Correspondent Banking Yes 19 a1 If Y 19 a1a Does the Entity offer Correspondent Banking services to domestic banks? 19 a1b Does the Entity allow domestic bank clients to provide downstream relationships? 19 a1c Does the Entity have processes and procedures | 3 |
| 19 a Correspondent Banking Yes 19 a1 If Y 19 a1a Does the Entity offer Correspondent Banking services to domestic banks? 19 a1b Does the Entity allow domestic bank clients to provide downstream relationships? 19 a1c Does the Entity have processes and procedures | 3 |
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| 19 a Correspondent Banking Yes 19 a1 If Y 19 a1a Does the Entity offer Correspondent Banking services to domestic banks? 19 a1b Does the Entity allow domestic bank clients to provide downstream relationships? 19 a1c Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? 19 a1d Does the Entity offer Correspondent Banking | S S |
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| 19 a 1 Correspondent Banking Yes 19 a1 If Y 19 a1a Does the Entity offer Correspondent Banking services to domestic banks? 19 a1b Does the Entity allow domestic bank clients to provide downstream relationships? 19 a1c Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? 19 a1d Does the Entity offer Correspondent Banking services to foreign banks? 19 a1e Does the Entity allow downstream relationships with foreign banks? 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 services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? 19 a1h Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? | |
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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 I | 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 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 e 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, and affiliabet | |
| | 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 | |
| | | |
| | | |
| | | |
| 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 | |

| | 1 | - |
|---------|---|---|
| 22 m | Suspicious Activity Reporting | |
| 22 n | Training and Education | |
| 22 o | Transaction Monitoring | |
| 23 | How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? | |
| 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. | |
| 25 | Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme? | |
| 26 | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? | |
| 26 a | If Y, provide further details | |
| 27 | Does the entity have a whistleblower policy? | |
| 28 | Confirm that all responses provided in the above Section are representative of all the LE's branches | |
| 28 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 29 | If appropriate, provide any additional information/context to the answers in this section. | |
| 4. ANTI | BRIBERY & CORRUPTION | |
| 30 | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? | |
| 31 | Does the Entity have an enterprise wide programme that sets minimum ABC standards? | |
| 32 | Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? | |
| 33 | Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? | |
| 34 | Is the Entity's ABC programme applicable to: | |
| 35 | Does the Entity have a global ABC policy that: | |
| 35 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. | |
| 35 b | Includes enhanced requirements regarding interaction with public officials? | |
| 35 c | Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? | |
| 36 | Does the Entity have controls in place to monitor the effectiveness of their ABC programme? | |
| 37 | Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? | |
| 38 | Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? | |
| 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? | |
| 40 | Does the Entity's ABC EWRA cover the inherent risk components detailed below: | |
| 40 a | Potential liability created by intermediaries and other third-party providers as appropriate | |
| | • | • |

| 40 b 40 c 40 d 40 e 41 42 42 a 42 b 42 c 42 c 42 f 43 44 44 a | Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions Changes in business activities that may materially increase the Entity's corruption risk Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures? Does the Entity provide mandatory ABC training to: Board and senior Committee Management 1st Line of Defence 2nd Line of Defence Third parties to which specific compliance activities subject to ABC risk have been outsourced Non-employed workers as appropriate (contractors/consultants) Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities? 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. | |
|--|--|--|
| 40 d 40 e 41 42 42 a 42 b 42 c 42 d 42 c 42 d 43 d 44 a | that involve state-owned or state-controlled entities or public officials Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions Changes in business activities that may materially increase the Entity's corruption risk Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures? Does the Entity provide mandatory ABC training to: Board and senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific compliance activities subject to ABC risk have been outsourced Non-employed workers as appropriate (contractors/consultants) Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities? 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 | |
| 40 e 41 42 42 a 42 b 42 c 42 d 42 e 42 f 43 44 | hospitality, hiring/internships, charitable donations and political contributions Changes in business activities that may materially increase the Entity's corruption risk Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures? Does the Entity provide mandatory ABC training to: Board and senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific compliance activities subject to ABC risk have been outsourced Non-employed workers as appropriate (contractors/consultants) Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities? 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 | |
| 41 42 42 a 42 b 42 c 42 c 42 d 42 e 42 f 43 44 | increase the Entity's corruption risk Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures? Does the Entity provide mandatory ABC training to: Board and senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific compliance activities subject to ABC risk have been outsourced Non-employed workers as appropriate (contractors/consultants) Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities? 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 | |
| 42 42 a 42 b 42 c 42 d 42 e 42 f 43 44 a | Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures? Does the Entity provide mandatory ABC training to: Board and senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific compliance activities subject to ABC risk have been outsourced Non-employed workers as appropriate (contractors/consultants) Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities? 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 | |
| 42 a 42 b 42 c 42 d 42 e 42 f 43 44 | Board and senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific compliance activities subject to ABC risk have been outsourced Non-employed workers as appropriate (contractors/consultants) Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities? 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 | |
| 42 b 42 c 42 d 42 e 42 f 43 44 | Board and senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific compliance activities subject to ABC risk have been outsourced Non-employed workers as appropriate (contractors/consultants) Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities? 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 | |
| 42 c 42 d 42 e 42 f 43 44 | 2nd Line of Defence 3rd Line of Defence Third parties to which specific compliance activities subject to ABC risk have been outsourced Non-employed workers as appropriate (contractors/consultants) Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities? 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 | |
| 42 d 42 e 42 f 43 44 44 a | 3rd Line of Defence Third parties to which specific compliance activities subject to ABC risk have been outsourced Non-employed workers as appropriate (contractors/consultants) Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities? 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 | |
| 42 f 42 f 43 44 44 a | Third parties to which specific compliance activities subject to ABC risk have been outsourced Non-employed workers as appropriate (contractors/consultants) Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities? 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 | |
| 42 f 43 44 44 a | subject to ABC risk have been outsourced Non-employed workers as appropriate (contractors/consultants) Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities? 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 | |
| 43 44 44 a | (contractors/consultants) Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities? 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 | |
| 44 a | to specific roles, responsibilities and activities? 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 | |
| 44 a | Section are representative of all the LE's branches If N, clarify which questions the difference/s relate 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? | |
| 49 49 a | Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous | |
| 49 b | and fictitious named accounts Prohibit the opening and keeping of accounts for | |
| 49 c | unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide | |
| 49 d | banking services to unlicensed banks Prohibit accounts/relationships with shell banks | |
| 49 a 49 e | Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides | |
| | services to shell banks | |
| 49 f | Prohibit opening and keeping of accounts for Section 311 designated entities | |
| 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 | |
| | Assess the risks of relationships with domestic and | |

| 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. | |
| C ANII CI | IF & 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 55 d | PEP Identification Transaction Screening | |
| 55 e | Name Screening against Adverse Media/Negative News | |
| 55 f | Training and Education | |
| 55 g | Governance | |
| 55 h 56 | Management Information 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 | Client | |
| 57 b | Product | |
| 57 c | Channel | |
| 57 d | Geography | |
| 58 | Doog the Entitule Comptions EMD A committee of 1 | |
| 58 3 | Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | |
| 58 a | effectiveness components detailed below: Customer Due Diligence | |
| 58 b | effectiveness components detailed below: Customer Due Diligence Governance | |
| | 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? | |
| 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 | |
| 00 a | | |
| | and the branch/es that this applies to. | |
| | | |
| | | |
| 61 | If appropriate, provide any additional | |
| 0. | information/context to the answers in this section. | |
| | information/context to the answers in this section. | |
| | | |
| | | |
| 7 KYC CE | 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: | |
| | 0 117 | |
| 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? | |
| 00. | | |
| 69 a | If Y, is this at: | |
| 69 a1 | Onboarding | |
| 69 a2 | KYC renewal | |
| | | |

| 69 a3 | Trigger event | |
|-------|--|--|
| 70 | 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 | 5 years or more | |
| 74 a5 | Trigger-based or perpetual monitoring reviews | |
| 74 a6 | Other (Please 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 | Virtual Asset Service Providers | |
| 76 y | Other (specify) | |
| 77 | If restricted, provide details of the restriction | |
| 78 | Does EDD require senior business management and/ or compliance approval? | |
| | | |

| 70 - | KV in the term is a second of the second of | |
|-------------------|---|--|
| 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. TRAINII | NG & 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 d | Third parties to which specific FCC activities have been outsourced | |
| 112 f | Non-employed workers (contractors/consultants) | |
| 113 | Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and | |
| 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 | tion Statement | | |
| Declaration | Group Correspondent Banking Due Diligence Questionnaire 2023 (CBD Statement (To be signed by Global Head of Correspondent Banking Laundering, Chief Compliance Officer, Global Head of Financial C | g 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. | 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 | |
| | 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 Financi | ial Institution commits to file accurate supplemental information on a | timely basis. | |
| I, the answers Institution. | | Correspondent Banking or equivalent), certify that I have read and understood this declaration, that by honest belief, and that I am authorised to execute this declaration on behalf of the Financial | |
| I, Wolfsberg (| | alent), certify that I have read and understood this declaration, that the answers provided in this a 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 | 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 branching that the appropries. | |
| | | |
| | | |
| 97 | If appropriate, provide any additional | |
| | information/context to the answers in this section. | |
| 1 | | |
| | | |
| 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 е | 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 |
| | I | |

| 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) :

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 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 Centue, 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 |

| 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 |

Page 5

| 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 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 |
| 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 |
| 54 a 54 a 54 b 54 c 54 c 55 d 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 |
| 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 54 c 54 c 55 d 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. | 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 |
| 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 555 c 55 a 55 c 55 c 55 d 55 e 55 f 56 a 57 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the 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 |
| 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 | 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 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 |
| 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 |
| 54 a 54 a 54 b 554 c 554 c 554 c 555 a 555 a 555 c 555 d 555 c 555 d 556 a 56 a 57 57 a 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: Customer Due Diligence | 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 | The state of the s | |
| 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 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 |

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

| e Entity's processes include gathering onal information to support its fraud controls, for ole: IP address, GPS location, and/or device ID? | Please select |
|---|--|
| | |
| m that all responses provided in the above n are representative of all the LE's branches | Please select |
| clarify which questions the difference/s relate to the branch/es that this applies to. | |
| ropriate, provide any additional ation/context to the answers in this section. | |
| r | n are representative of all the LE's branches clarify which questions the difference/s relate to the branch/es that this applies to. |

| information/context to the ans | wers in this section. |
|--|---|
| | |
| Declaration Statement | |
| | gence Questionnaire 2023 (CBDDQ V1.4) Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of er, Global Head of Financial Crimes Compliance OR equivalent) |
| Banco Bilbao Vizcaya Argentaria, S.A. | (Financial Institution name) is fully committed to the fight against financial crime and makes pplicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts. |
| | ppicable infancial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts. importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its |
| The Financial Institution recognises the importan standards. | ice of transparency regarding parties to transactions in international payments and has adopted is committed to adopting these |
| | es with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles DQ 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, the answers provided in this Wolfsberg CBDDQ Institution. | (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, the are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial |
| I,Edna LIU Wolfsberg CBDDQ are complete and correct to r | (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution. |
| | |
| / | (Signature & Date) |
| O8 Januar | ry 2024 (Signature & Date) |



Financial Institution Name: Location (Country) :

BANCO BILBAO VIZCAYA ARGENTARIA SA - PORTUGAL BRANCH

PORTUGAL

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

| No# | Question | Answer |
|-----------|--|--|
| 1. ENTITY | & OWNERSHIP | |
| 1 | Full Legal Name | BANCO BILBAO VIZCAYA ARGENTARIA SA - PORTUGAL BRANCH |
| 2 | Append a list of foreign branches which are covered by this questionnaire | PORTUGAL |
| 3 | Full Legal (Registered) Address | AV. LIBERDADE 222 1250-148 LISBON PORTUGAL |
| 4 | Full Primary Business Address (if different from above) | |
| 5 | Date of Entity incorporation/establishment | 29-06-2018 |
| 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 | T reces select |
| 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) | |
| | ı | 1 |

| 13 | Jurisdiction of licensing authority and regulator of ultimate parent | |
|-----------------|---|----------------|
| | | |
| | | |
| 14 | Select the business areas applicable to the Entity | |
| 14 a | Retail Banking | Please select |
| 14 b | Private Banking | Please select |
| 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 | Wealth Management | Please select |
| 14 k | Other (please explain) | T TOUSE SOLOCI |
| 14 K | Опет (реазе ехрапт) | |
| 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) | Please select |
| 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 | Please select |
| 16 b | Total Assets | Please select |
| 17 | Confirm that all responses provided in the above | Flease Select |
| 17 | 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. | |
| 2. PRODU | CTS & SERVICES | |
| 19 | Does the Entity offer the following products and services: | |
| 19 a | | Disease select |
| | Correspondent Banking | Please select |
| 19 a1 19 a1a | If Y Does the Entity offer Correspondent Banking | Please select |
| 19 a1b | services to domestic banks? Does the Entity allow domestic bank clients to | |
| 19 a1c | provide downstream relationships? Does the Entity have processes and procedures | Please select |
| 19 416 | 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 |
| | • | |

| 19 a1i | Does the Entity have processes and procedures | |
|---|--|--|
| | in place to identify downstream relationships with | Please select |
| | MSBs /MVTSs/PSPs? | I leade defect |
| | | |
| 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 | Please select |
| 19 f | International Cash Letter | Please select |
| _ | | |
| 19 g | Low Price Securities | Please select |
| 19 h | Payable Through Accounts | Please select |
| 19 i | Payment services to non-bank entities who may | |
| 101 | then offer third party payment services to their customers? | Please select |
| 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) | No |
| 19 i4 | eCommerce Platforms | Please select |
| 19 i5 | Other - Please explain | |
| | | |
| 19 j | Private Banking | Please select |
| 19 k | Remote Deposit Capture (RDC) | Please select |
| | , | |
| 19 I | Sponsoring Private ATMs | Please select |
| 19 m | Stored Value Instruments | Please select |
| 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: | |
| 10 m1 | Chook applies conting | Please select |
| 19 p1 | Check cashing service | |
| 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 | Please select |
| | | |
| 19 p3a | If yes, state the applicable level of due diligence | Please select |
| | | Please select No |
| 19 p4 | Sale of Monetary Instruments | No |
| 19 p4 19 p4a | Sale of Monetary Instruments If yes, state the applicable level of due diligence | |
| 19 p4 | Sale of Monetary Instruments | No |
| 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 | No |
| 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 | No |
| 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 | No Please select |
| 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 Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to | No Please select |
| 19 p4 19 p4a 19 p5 19 p5 20 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. | No Please select |
| 19 p4 19 p4a 19 p5 19 p5 20 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. | No Please select |
| 19 p4 19 p4a 19 p5 19 p5 20 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. | No Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT | 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. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: | No Please select Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C7 22 | 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. F & 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 | No Please select Please select Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT | 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. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: | No Please select Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C7 22 22 a 22 b | 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. FF & 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 | No Please select Please select Please select Please select Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C7 22 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. F & 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 | No Please select Please select Please select Please select Please select Please select Please select |
| 19 p4 19 p4a 19 p5 19 p5 20 20 a 21 3. AML, CT 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. F & 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 | No Please select Please select Please select Please select Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C7 22 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. F & 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 | No Please select Please select Please select Please select Please select Please select Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT 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. F & 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 | No Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f | 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. F & 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 | No 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 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C7 22 22 a 22 b 22 c 22 d 22 e 22 f 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. F & 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 | No 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 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f | 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. F & 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 | No 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 p4 19 p4a 19 p5 19 p5 20 20 a 21 3. AML, CT 22 22 b 22 c 22 c 22 d 22 e 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. F & 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 | No 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 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c 22 d 22 c 22 f 22 g 22 h 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. F & 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 | No 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 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C7 22 22 a 22 b 22 c 22 d 22 e 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. F & 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 | No Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c 22 d 22 c 22 f 22 g 22 h 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. F & 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 | No 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 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C7 22 22 a 22 b 22 c 22 d 22 e 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. F & 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 | No Please select |

| 22 m | Suspicious Activity Reporting | Please select |
|-----------|---|---------------|
| 22 m | 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? | Please select |
| 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 E | 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 | |
|---|--|---|
| 40 B | Corruption risks associated with the countries and industries in which the Entity does business, directly | Disease select |
|] | or through intermediaries | Please select |
| 40.0 | , and the second | |
| 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 | Please select |
| | increase the Entity's corruption risk | |
| 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 |
| 40.6 | - | |
| 42 f | Non-employed workers as appropriate (contractors/consultants) | Please select |
| 42 | , | |
| 43 | Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities? | Please select |
| 44 | | |
| 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 | |
| 44 a | and the branch/es that this applies to. | |
| | and the branchives that this applies to. | |
| | | |
| 45 | If any and the control of the contro | |
| 45 | If appropriate, provide any additional information/context to the answers in this section. | |
| | iniornation/context to the answers in this section. | |
| | | |
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| - AMI 07 | E A CANOTIONO DOLLOIDO A DECOCEDURES | |
| | F & SANCTIONS POLICIES & PROCEDURES | |
| 5. AML, CT | Has the Entity documented policies and procedures | |
| | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions | |
| | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, | |
| 46 | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: | |
| 46 46 a | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering | Please select |
| 46 a 46 b | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing | Please select |
| 46 a 46 b 46 c | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations | |
| 46 a 46 b | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at | Please select |
| 46 a 46 b 46 c 47 | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? | Please select Please select |
| 46 a 46 b 46 c | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and | Please select Please select |
| 46 a 46 b 46 c 47 | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: | Please select Please select Please select |
| 46 a 46 b 46 c 47 48 a 48 a | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards | Please select Please select Please select Please select |
| 46 a 46 b 46 c 47 48 a 48 a 48 a 1 | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? | Please select Please select Please select Please select Please select Please select |
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| 46 a 46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d 49 e | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities | 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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| 46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b 49 b 49 c 49 d 49 e | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for Section 311 designated entities | 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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| 46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 49 a 49 a 49 b 49 c 49 d 49 e 49 f 49 g | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for Section 311 designated entities | 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 |
| 46 a 46 b 46 c 47 48 48 a 48 a 48 b 49 a 49 b 49 c 49 d 49 e 49 f 49 g | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Pose the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for section 311 designated entities Assess the risks of relationships with domestic and | 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 |

| 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 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. | |
| | | |
| C ANN CTE | FOR CANCETONIC PICIV ACCEPCEMENT | |
| 6. AML, CTF | F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: | |
| 54 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: | Diagonal estate |
| 54 54 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client | Please select Please select |
| 54 a 54 b | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product | 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 | 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 Channel Geography Does the Entity's AML & CTF EWRA cover the | Please select Please select |
| 54 a 54 b 54 c 54 d 55 d 55 d 55 a 55 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: | Please select Please select Please select |
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| 54 a 54 b 54 c 55 d 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 b 54 c 55 d 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 |
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| 54 a 54 a 54 b 54 c 54 d 55 55 a 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 | 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 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 57 a 57 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the 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 |
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| 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 56 a 57 a 57 a 57 b 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 |
| 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 56 a 57 c 57 d 58 a 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 |
| 54 a 54 b 54 c 54 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 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 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 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 |
| 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 56 a 57 c 57 d 58 a 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 |

| 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? | |
| 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. If appropriate, provide any additional | |
| | information/context to the answers in this section. | |
| 7. KYC, CI | 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: | FIEdase aciecul |
| 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 | |
| 66 | 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: | |
| 67.01 | 11.2 | Disconsist |
| 67 a1 | Product Usage | Please select |
| 67 a2 | Geography | Please select |
| 67 a3 | Business Type/Industry | Please select |
| 67 a4 | Legal Entity type Adverse Information | Please select |
| 67 a5 | | 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 | Other | Please select |
| 68 a4a | If yes, please specify "Other" | |
| 69 69 a | Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? If Y, is this at: | Please select |
| 69 a 69 a1 | | Places select |
| | Onboarding KYC renewal | Please select |
| 69 a2 | KYC renewal | Please select |

| 60.52 | Trigger event | Plagas salast |
|-------|--|----------------------------|
| 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 | 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) | |
| 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 | EDD on risk-based approach |
| 76 h | MSB/MVTS customers | Always subject to EDD |
| 76 i | Non-account customers | Prohibited |
| | | |
| 76 j | Non-Government Organisations | EDD on risk-based approach |
| 76 k | Non-resident customers | EDD on risk-based approach |
| 76 I | Nuclear power | EDD on risk-based approach |
| 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 | EDD on risk-based approach |
| 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 | EDD on risk-based approach |
| 76 w | Used Car Dealers | Please select |
| 76 x | Virtual Asset Service Providers | Please select |
| 76 y | Other (specify) | · 10000 00000 |
| 77 | If restricted, provide details of the restriction | |
| 78 | Does EDD require senior business management and/ or compliance approval? | Please select |

| 70 2 | If V indicate who provides the approval: | Plana calcat |
|------------|---|---------------|
| 78 a 79 | If Y indicate who provides the approval: | Please select |
| - | 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. MONITO | 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. PAYME | I NT 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 | |
| İ | to ensure compliance with: | |
| 93 a | FATF Recommendation 16 | Disease select |
| | | Please select |
| 93 b | Local Regulations | Please select |
| 93 b1 | If Y, specify the regulation | |
| | | |
| | | |
| | | |
| 93 c | If N, explain | |
| 93 C | II IV, explain | |
| | | |
| | | |
| | | |
| 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 | |
| 33 | of required beneficiary information cross-border | |
| | payment messages? | Please select |
| | | |
| 95 a | If Y, does the Entity have procedures to include | |
| 1 | beneficiary address including country in cross | Please select |
| İ | border payments? | |
| 96 | Confirm that all responses provided in the above | |
| 1 | Section are representative of all the LE's branches | Please select |
| 96 a | • | |
| 30 d | If N, clarify which questions the difference/s relate to | |
| İ | 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 | 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 | 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 | 1 lease select |
| İ | and/or masking, of sanctions relevant information in | |
| 1 | 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 |
| İ | against Sanctions Lists? | |
| 400 | | |
| 102 | What is the method used by the Entity for sanctions | Please select |
| | screening? | 1100000000 |
| 102 a | If 'automated' or 'both automated and manual' | |
| İ | 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) | |
| 103 | Does the Entity screen all sanctions relevant data, | |
| 103 | 1 | |
| | including at a minimum, entity and location | Please select |
| | information, contained in cross border transactions | |
| | against Sanctions Lists? | |
| 104 | What is the method used by the Entity? | Please select |
| 104 | | |

| 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. | |
| | IG & 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 3rd Line of Defence | Please select |
| 112 d 112 e | Third parties to which specific FCC activities have been outsourced | Please select Please select |
| 112 f | | Places select |
| 113 | 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? | Please select 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? | Every Two Years |
| 115 | Confirm that all responses provided in the above 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. | |
| | | |
| | 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 |
| 123 123 a | Does the internal audit function or other independent third party cover the following areas: | |
| | AML, CTF, ABC, Fraud and Sanctions policy and procedures | Please select |
| 123 b 123 c | Enterprise Wide Risk Assessment | Please select |
| 123 C | Governance KYC/CDD/EDD and underlying methodologies | Please select Please select |
| 123 d | 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 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 |
| | | |

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| ot . |
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| |

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 SA - PORTUGAL 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, ______(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, JORGE MANUEL CANHA CARVALHO LUIS (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)

DIGITAL SIGNATURE ON 2023/NOVEMBER/27



(Signature & Date)

Assinado por; Jorge Manuel Canha Carvalho Luís Identificação: BI07440544 Data: 2023-11-27 às 15: 46:44 Local: LISBON Motivo: WOLFSBERG QUESTIONNAIRE BBVA PORTUGAL

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 p | | | |
|--|---------|---|--|
| Select he business areas applicable to the Entity No | 13 | | |
| Retail Banking | 1 | ultimate parent | |
| Retail Banking | | | |
| Retail Banking | | | |
| Retail Banking | 14 | Select the business areas applicable to the Entity | |
| Private Banking Prese select | | | |
| 14 c Commercial Banking Please select | | | |
| Tensactional Banking | | | |
| 14 Investment Banking No | | | |
| Heart Presen | | | Please select |
| 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 | | | |
| 15 Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revuel from non-resident customers primarily resident in a different jurisdiction to the location where bank services are provided in the analysis of its revuel from non-resident customers primarily resident in a different jurisdiction to the location where bank services are provided in the analysis of the control of the primary in the control of the contro | | | |
| portfolio of non-resident customers or does it derive more than 10% of its evenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided) 15 a | '- | Gurer (predde expidin) | |
| portfolio of non-resident customers or does it derive more than 10% of its evenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided) 15 a | | | |
| portfolio of non-resident customers or does it derive more than 10% of its evenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided) 15 a | | | |
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| (PSPs)? Please select 19 a1h1 MSBs Please select 19 a1h2 MVTSs Please select | 19 a1h | | |
| 19 a1h1 MSBs Please select 19 a1h2 MVTSs Please select | | | [이번 1 [[[[[[[[[[[[[[[[[[|
| 19 a1h2 MVTSs Please select | | (PSPS)? | [2] 그리고 하는 기반도 하는 말이라고 말했습니다. 그는 그는 말이 되었다고 밝는다. |
| 19 a1h2 MVTSs Please select | 19 a1h1 | MSBs | Please select |
| | 19 a1h2 | MVTSs | The state of the s |
| 1 read screen | 19 a1h3 | | |
| | | | I reade delect |

| 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 |
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| 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 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 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 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 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 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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| 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 SAN |
| 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 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 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 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 |
| 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 PARTY OF THE PAR |
| 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 praffches | |

| 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 | THE RESERVE 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 Shanght (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 egal and regulatory obligations. | | | |
| 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. | (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. | | | |
| | Wenjie He (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 & Da | te) | | |
| Wait 74 NOV 4073 (Signature & 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 | Provide the full legal name of the ultimate parent (if | |
|---|--|---|
| | different from the Entity completing the DDQ) | |
| | unierent nom the Entity completing the DDQ) | l., |
| | | None |
| | | |
| | | |
| 13 | Jurisdiction of licensing authority and regulator of | |
| 13 | | |
| | ultimate parent | |
| | | 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 |
| 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 (400/ or mars) north-li- | |
| 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- | Yes |
| | resident means customers primarily resident in a | 160 |
| | different jurisdiction to the location where bank services | |
| | are provided) | |
| 15 a | If Y, provide the top five countries where the non-resident | 4 Dami |
| 15 a | | |
| | customers are located. | 2. Colombia |
| | | 3. Argentina |
| | | 4. Bermuda |
| | | 5. Mexico |
| 16 | Select the closest value: | |
| | | 54.000 |
| 16 a | Number of employees | 51-200 |
| 16 b | Total Assets | Greater than \$500 million |
| 17 | Confirm that all responses provided in the above Section | L. |
| | are representative of all the LE's branches. | No |
| | · · | |
| 17 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. |
| | | |
| | | |
| 40 | 16 | |
| 18 | If appropriate, provide any additional information/context | |
| | to the answers in this section. | |
| | | |
| | | |
| | | |
| 2 PPODII | CTS & SERVICES | |
| | | |
| 19 | Does the Entity offer the following products and services: | |
| 19 a | Correspondent Banking | Yes |
| 19 a1 | If Y | |
| 19 a1a | Does the Entity offer Correspondent Banking services to | |
| | domestic banks? | No |
| 19 a1b | Does the Entity allow domestic bank clients to provide | |
| 12 910 | | No |
| | downstream relationships? | |
| 19 a1c | Does the Entity have processes and procedures in place | |
| | to identify downstream relationships with domestic | Yes |
| | banks? | |
| 19 a1d | Does the Entity offer Correspondent Banking services to | |
| | foreign banks? | Yes |
| 19 a1e | Does the Entity allow downstream relationships with | |
| 12 416 | | No |
| | foreign banks? | |
| 19 a1f | Does the Entity have processes and procedures in place | Yes |
| | to identify downstream relationships with foreign banks? | 160 |
| 19 a1g | Does the Entity offer Correspondent Banking services to | |
| | regulated Money Services Businesses (MSBs)/Money | la. |
| | Value Transfer Services (MVTSs)? | No |
| | value Hallolel Oct VICES (IVIV 105): | |
| | | |
| 19 a1h | Does the Entity allow downstream relationshine with | |
| 19 a1h | Does the Entity allow downstream relationships with | |
| | MSBs, MVTSs, or Payment Service Provider (PSPs)? | N. |
| 19 a1h1 | MSBs, MVTSs, or Payment Service Provider (PSPs)? MSBs | No |
| | MSBs, MVTSs, or Payment Service Provider (PSPs)? | No No |
| 19 a1h1 19 a1h2 | MSBs, MVTSs, or Payment Service Provider (PSPs)? MSBs | No |
| 19 a1h1 19 a1h2 19 a1h3 | MSBs, MVTSs, or Payment Service Provider (PSPs)? MSBs MVTSs PSPs | |
| 19 a1h1 19 a1h2 | MSBs, MVTSs, or Payment Service Provider (PSPs)? MSBs MVTSs PSPs Does the Entity have processes and procedures in place | No No |
| 19 a1h1 19 a1h2 19 a1h3 | 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 |
| 19 a1h1 19 a1h2 19 a1h3 19 a1i | 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 |
| 19 a1h1 19 a1h2 19 a1h3 19 a1i | 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 |
| 19 a1h1 19 a1h2 19 a1h3 19 a1i | 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 |

| | T | |
|--------------|--|---|
| 19 d | | No |
| 19 e | Hold Mail | No |
| 19 f | International Cash Letter | No |
| 19 g | | No |
| 19 h | | No |
| | | 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 | |
| 19 i3 | Virtual Asset Service Providers (VASPs) | |
| 19 i4 | eCommerce Platforms | |
| 19 i5 | Other - Please explain | |
| 10.10 | Caron Fredoc explain | |
| | | |
| | | |
| | | |
| | | |
| 19 j | Private Banking | No |
| 19 k | Remote Deposit Capture (RDC) | No I |
| 19 I | Sponsoring Private ATMs | No |
| 19 m | Stored Value Instruments | No No |
| | Trade Finance | |
| 19 n | | 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 | |
| 19 p2 | Wire transfers | No |
| 19 p2a | If yes, state the applicable level of due diligence | |
| 19 p3 | Foreign currency conversion | No |
| | | NO . |
| 19 p3a | If yes, state the applicable level of due diligence | |
| 19 p4 | Sale of Monetary Instruments | No |
| 19 p4a | If yes, state the applicable level of due diligence | |
| 19 p5 | If you offer other services to walk-in customers please | |
| | provide more detail here, including describing the level of | |
| | due diligence. | |
| | , and the second | |
| | | |
| 19 q | Other high-risk products and services identified by the | |
| 13 4 | Entity (please specify) | |
| | Entity (please specify) | FX Trading Third Party |
| | | Demand Deposit Accounts (Checking, Savings) |
| | | |
| | | |
| 20 | Confirm that all responses provided in the above Section | No |
| | 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. | |
| | | 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. | |
| | | |
| | | |
| | | |
| 2 AMI OT | E & SANCTIONS PROCEAMME | |
| | 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 d | CDD | Yes |
| 22 e 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 |
| 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, | 11-100 |
| | CTF & Sanctions Compliance Department? | |
| 24 | Is the Entity's AML, CTF & Sanctions policy approved at | |
| | Head annually by the Doord or equivalent Conier | l., |
| | least annually by the Board or equivalent Senior | I Yes |
| | Management Committee? If N, describe your practice in | Yes |
| | | Yes |

| 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 | No |
| 00 - | are representative of all the LE's branches | |
| 28 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | 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 BI | 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 | Yes |
| 35 b | advantage 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 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 | |
| 40 a | components detailed below: Potential liability created by intermediaries and other | · · |
| 40 b | third-party providers as appropriate Corruption risks associated with the countries and | Yes |
| | 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 | |
| 48 a | procedures against: U.S. Standards | Yes |
| 48 a1 | | |
| | If Y, does the Entity retain a record of the results? | Yes |
| 48 b | EU Standards | Yes |
| 48 b1 | If Y, does the Entity retain a record of the results? | Yes |
| 49 | Does the Entity have policies and procedures that: | |
| 49 a | Prohibit the opening and keeping of anonymous and | |
| -5 a | 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 | res |
| 49 d | Prohibit accounts/relationships with shell banks | Yes |
| | Prohibit dealing with another entity that provides services | TGS |
| 49 e | 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 | Yes |
| 49 h | transfer agents Assess the risks of relationships with domestic and | |
| 49 i | foreign PEPs, including their family and close associates | Yes |
| | 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 | Yes |
| 49 I | branches and affiliates 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 | Yes |
| | comply with applicable laws? | |

| 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 Pilino de Control de |
| | | 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. AML, CTF | & 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 | Geography | Yes |
| 55 | Does the Entity's AML & CTF EWRA cover the controls | |
| | effectiveness components detailed below: | No. |
| 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 |
| 55 h | Management Information | Yes |
| 56 | Has the Entity's AML & CTF EWRA been completed in | |
| | the last 12 months? | Yes |
| 56 a | If N, provide the date when the last AML & CTF EWRA | |
| ••• | was completed. | |
| | nas sempretea. | |
| | | |
| | | |
| | Dans the Entit de Countinue EVVDA account the interest | |
| 57 | Does the Entity's Sanctions EWRA cover the inherent | |
| | 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 | |
| | was completed. | |
| | | |
| | | |
| | | |
| 60 | Confirm that all responses provided in the share Confirm | |
| 00 | Confirm that all responses provided in the above Section | No |
| 60.0 | 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. | |
| | une branchies mar mis applies to. | Coo DDVA Due Diligence for clohal broads FDDVA C A |
| | | See BBVA Due Diligence for global branches of BBVA S.A. |
| | | |
| | <u> </u> | |
| 61 | If appropriate, provide any additional information/context | |
| | to the answers in this section. | |
| | | |
| | | |
| | | |
| 7 KYC CE | DD and EDD | |
| | Does the Entity verify the identity of the customer? | Yes |
| 62 | | 100 |
| 63 | Do the Entity's policies and procedures set out when | Voc. |
| | CDD must be completed, e.g. at the time of onboarding | Yes |
| 64 | 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 |
| | | Teo |
| 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 | 10% |
| | to beneficial ownership identification? | |
| 67 | Does the due diligence process result in customers | V |
| | receiving a risk classification? | Yes |
| 67 a | If Y, what factors/criteria are used to determine the | |
| or a | | |
| | customer's risk classification? Select all that apply: | |
| 67 a1 | Product Usage | Yes |
| 67 a2 | Geography | Yes |
| 67 a3 | Business Type/Industry | Yes |
| 67 a4 | Legal Entity type | Yes |
| 67 a5 | Adverse Information | Yes |
| | | 169 |
| 67 a6 | Other (specify) | l l |
| | | We also use the duration of the relationship, the current activity/trading volume, and the sanctions screening risk. |
| <u>co</u> | For high risk page individual anatoms of the 199 | |
| 68 | For high risk non-individual customers, is a site visit a | Yes |
| | part of your KYC process? | |
| 68 a | If Y, is this at: | |
| 68 a1 | Onboarding | Yes |
| 68 a2 | KYC renewal | Yes |
| | | |
| 68 a3 | Trigger event | Yes |
| 68 a4 | Other | No |
| 69 | Does the Entity have a risk based approach to screening | Yes |
| | customers for Adverse Media/Negative News? | 165 |
| 69 a | If Y, is this at: | |
| 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 | Combination of automated and manual |
| | Adverse Media/Negative News? | Combination of automated and manual |
| 71 | Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? | Yes |
| 71 a | If Y, is this at: | |
| 71 a1 | Onboarding | Yes |
| | | |
| 71 a2 | KYC renewal | Yes |
| 71 a3 | Trigger event | Yes |
| 72 | What is the method used by the Entity to screen PEPs? | Combination of automated and manual |
| 73 | Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? | Yes |
| 74 | Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? | Yes |
| 74 a | If yes, select all that apply: | |
| 74 a1 | Less than one year | No |
| 74 a2 | 1 – 2 years | Yes |
| 74 a2 | 3 – 4 years | Yes |
| | | |
| 74 a4 | 5 years or more | No |
| 74 a5 | Trigger-based or perpetual monitoring reviews | Yes |
| 74 a6 | Other (Please specify) | |
| 75 | Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews? | Yes |
| 76 | From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme? | |

| 76.0 | Arma defence military | EDD on the board arrange |
|---------------|--|--|
| 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 76 k | Non-Government Organisations Non-resident customers | EDD on risk-based approach EDD on risk-based approach |
| 76 I | 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 76 w | Unregulated charities Used Car Dealers | Do not have this category of customer or industry Do not have this category of customer or industry |
| 76 W | Virtual Asset Service Providers | Do not have this category of customer or industry |
| 76 y | Other (specify) | Do not have also category or castomer or illuatiny |
| , | Calci (specify) | |
| | | EDD on risk-based approach |
| | | |
| | | |
| 77 | If restricted, provide details of the restriction | |
| | | |
| | | |
| | | |
| 78 | Does EDD require senior business management and/or | v. |
| | 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? | |
| 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 | |
| o i u | the branch/es that this applies to | |
| | The state of the s | See BBVA Due Diligence for global branches of BBVA S.A. |
| | | |
| | | |
| 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 | |
| | 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 |
| 84 a | transactions for suspicious activities? If manual or combination selected, specify what type of | |
| 04 d | transactions are monitored manually | |
| | a anodotions 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 | Both |
| 0411 | system or vendor-sourced tools used? | |
| 84 b1 | If 'Vendor-sourced tool' or 'Both' selected, what is the | |
| | name of the vendor/tool? | Mantas Oracle |
| | | INIGINGS OF AGIC |
| | | |
| 84 b2 | When was the tool last updated? | |
| 84 b3 | When was the automated Transaction Monitoring | |
| U-1 20 | application last calibrated? | <1 year |
| 85 | Does the Entity have regulatory requirements to report | Voc |
| | suspicious transactions? | Yes |
| | | |

| | gpp | Tent burning but bingerioe Questionnaire (ObbbQ) V1.4 |
|-----------|---|--|
| 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 102 a1a | Are internal system of vendor-sourced tools used? If a 'vendor-sourced tool' or 'both' selected, what is the | Vendor-sourced tools |
| 102 414 | 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 |
| 104 105 | 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 | Yes |
| 111 b | authorities Examples of different forms of money laundering, | |
| | terrorist financing and sanctions violations relevant for the types of products and services offered | Yes |
| 111 c | Internal policies for controlling money laundering, terrorist financing and sanctions violations | Yes |
| 111 d | New issues that occur in the market, e.g. significant | Yes |
| | regulatory actions or new regulations | |

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| 444 | 10 l 10. H | N. |
|----------------|--|---|
| 111 e | Conduct and Culture | Yes |
| 111 f | Fraud | Yes |
| 112 | Is the above mandatory training provided to : Board and Senior Committee Management | Vsa. |
| 112 a 112 b | 1st Line of Defence | Yes Yes |
| 112 b | 2nd Line of Defence | Yes |
| 112 d | 3rd Line of Defence | Yes |
| 112 d | Third parties to which specific FCC activities have been | |
| 1120 | outsourced | No |
| 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, | Yes |
| 444 : | CTF and Sanctions staff? | |
| 114 a 115 | If Y, how frequently is training delivered? | Other |
| 115 | Confirm that all responses provided in the above Section are representative of all the LE's branches | No |
| 115 a | If N, clarify which questions the difference/s relate to and | |
| 115 a | the branch/es that this applies to. | |
| | the branchies that this applies to. | See BBVA Due Diligence for global branches of BBVA S.A. |
| | | Gee BBVA Due Diligence for global branches of BBVA G.A. |
| | | |
| 116 | If appropriate, provide any additional information/context | |
| | to the answers in this section. | |
| | | |
| | | |
| | | |
| | ASSURANCE /COMPLIANCE TESTING | |
| 117 | Does the Entity have a program wide risk based Quality | |
| | 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 |
| 440 | independent Audit function)? | |
| 119 | Confirm that all responses provided in the above Section | No |
| 440 - | 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. | Con DDVA Due Diligence for cloted beganning of DDVA C A |
| | | 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 unewere in the econom. | |
| | | |
| | | |
| 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 | Yes |
| | 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 | Yearly |
| 122 b | External Third Party | Not Applicable |
| 123 | Does the internal audit function or other independent | |
| | third party cover the following areas: | |
| 123 a | AML, CTF, ABC, Fraud and Sanctions policy and | Yes |
| | procedures | |
| 123 b | Enterprise Wide Risk Assessment | Yes |
| 123 c | Governance | Yes |
| 123 d | KYC/CDD/EDD and underlying methodologies | Yes |
| 123 e | Name Screening & List Management | Yes |
| 123 f | Reporting/Metrics & Management Information | Yes |
| 123 g | Suspicious Activity Filing | Yes |
| 123 h | Technology Transaction Manitoring | Yes |
| 123 i | Transaction Monitoring | Yes |
| 123 j | Transaction Screening including for sanctions | Yes |
| 123 k | Training & Education | Yes |
| 123 I | Other (specify) | |
| | | |
| | | |
| | | |
| 124 | Are adverse findings from internal & external audit | |
| 147 | tracked to completion and assessed for adequacy and | Yes |
| | completeness? | 1.00 |
| | | |

| 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 | |

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 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.

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, Krustine Cangementa (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 beflef, and that I am authorised to execute this declaration on behalf of the Financial Institution.

Date: March 7th, 2024

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 Ti | | |
| y av Ti | 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 19 a1b | 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 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 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 65 g 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 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 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 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 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 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 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 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 55 c 55 a 55 b 55 c 55 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. 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 |
| 54 a 54 a 54 b 55 c 55 a 55 c 55 d 55 c 55 d 55 e 55 f 55 a 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 |

| 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 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 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 VVC | CDD and EDD | |
| | | Disagraphia di Santa di Santa di Santa di Santa di Santa di Santa di Santa di Santa di Santa di Santa di Santa |
| 62 | Does the Entity verify the identity of the customer? Do the Entity's policies and procedures set out when | Please select |
| 63 | 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 Please select |
| 65 d 66 | Other relevant parties 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? | Pfease select |
| 69 a | If Y, is this at: | |
| 69 a1 | Onboarding | Please select |
| 69 a2 | KYC renewal | Please select |

| Trigger event at is the method used by the Entity to screen for verse Media/Negative News? Is the Entity have a risk based approach to screening tomers and connected parties to determine whethe vare PEPs, or controlled by PEPs? Y, is this at: Onboarding KYC renewal Trigger event at is the method used by the Entity to screen PEPs? Is the Entity have policies, procedures and processes view and escalate potential matches from screening tomers and connected parties to determine whether vare PEPs, or controlled by PEPs? YC renewad at defined frequencies based on risk ing (Periodic Reviews)? yes, select all that apply: Less than one year 1 – 2 years 3 – 4 years 5 years or more Trigger-based or perpetual monitoring reviews Other (Please specify) as the Entity maintain and report metrics on current t past periodic or trigger event due diligence iews? In the list below, which categories of customers or ustries are subject to EDD and/or are restricted, or hibited by the Entity's FCC programme? In the list below, which categories of customers or ustries are subject to EDD and/or are restricted, or hibited by the Entity's FCC programme? | Please select Please select Please select Please select Please select Please select S |
|---|--|
| verse Media/Negative News? Is the Entity have a risk based approach to screening tomers and connected parties to determine whether a risk passed approach to screening tomers and connected parties to determine whether are PEPs, or controlled by PEPs? Y, is this at: Onboarding KYC renewal Trigger event at is the method used by the Entity to screen PEPs? as the Entity have policies, procedures and processes where and escalate potential matches from screening tomers and connected parties to determine whether are PEPs, or controlled by PEPs? CYC renewad at defined frequencies based on risking (Periodic Reviews)? It is the method used by the Entity to screen PEPs? CYC renewad at defined frequencies based on risking (Periodic Reviews)? It is the process of the process of the process of the process of the process of the process of the process of the process of customers or ustries are subject to EDD and/or are restricted, or hibited by the Entity's FCC programme? | 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 No Please select |
| tomers and connected parties to determine whether are PEPs, or controlled by PEPs? Y, is this at: Onboarding KYC renewal Trigger event at is the method used by the Entity to screen PEPs? Is the Entity have policies, procedures and processes eview and escalate potential matches from screening tomers and connected parties to determine whether are PEPs, or controlled by PEPs? YC renewad at defined frequencies based on risking (Periodic Reviews)? yes, select all that apply: Less than one year 1 – 2 years 3 – 4 years 5 years or more Trigger-based or perpetual monitoring reviews Other (Please specify) as the Entity maintain and report metrics on current of past periodic or trigger event due diligence lews? In the list below, which categories of customers or ustries are subject to EDD and/or are restricted, or hibited by the Entity's FCC programme? | 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 No Please select |
| Onboarding KYC renewal Trigger event at is the method used by the Entity to screen PEPs? is the Entity have policies, procedures and processes eview and escalate potential matches from screenling tomers and connected parties to determine whether y are PEPs, or controlled by PEPs? CYC renewed at defined frequencies based on risk ing (Periodic Reviews)? yes, select all that apply: Less than one year 1 – 2 years 3 – 4 years 5 years or more Trigger-based or perpetual monitoring reviews Other (Please specify) es the Entity maintain and report metrics on current of past periodic or trigger event due diligence lews? In the list below, which categories of customers or ustries are subject to EDD and/or are restricted, or hibited by the Entity's FCC programme? | Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select No Please select |
| KYC renewal Trigger event at is the method used by the Entity to screen PEPs? is the Entity have policies, procedures and processes wiew and escalate potential matches from screening tomers and connected parties to determine whether is are PEPs, or controlled by PEPs? CYC renewed at defined frequencies based on risk ing (Periodic Reviews)? ives, select all that apply: Less than one year 1 – 2 years 3 – 4 years 5 years or more Trigger-based or perpetual monitoring reviews Other (Please specify) set the Entity maintain and report metrics on current of past periodic or trigger event due diligence lews? In the list below, which categories of customers or sustries are subject to EDD and/or are restricted, or hibited by the Entity's FCC programme? | Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select No Please select |
| Trigger event at is the method used by the Entity to screen PEPs? at its the method used by the Entity to screen PEPs? at the Entity have policies, procedures and processes aview and escalate potential matches from screening tomers and connected parties to determine whether are PEPs, or controlled by PEPs? CYC renewed at defined frequencies based on risking (Periodic Reviews)? yes, select all that apply: Less than one year 1 – 2 years 3 – 4 years 5 years or more Trigger-based or perpetual monitoring reviews Other (Please specify) as the Entity maintain and report metrics on current of past periodic or trigger event due diligence lews? In the list below, which categories of customers or sustries are subject to EDD and/or are restricted, or hibited by the Entity's FCC programme? | Please select Please select Please select Please select Please select Please select Please select Please select No Please select |
| at is the method used by the Entity to screen PEPs? Is the Entity have policies, procedures and processes where and escalate potential matches from screening tomers and connected parties to determine whether yere PEPs, or controlled by PEPs? CYC renewed at defined frequencies based on risk ng (Periodic Reviews)? yes, select all that apply: Less than one year 1 – 2 years 3 – 4 years 5 years or more Trigger-based or perpetual monitoring reviews Dither (Please specify) as the Entity maintain and report metrics on current It past periodic or trigger event due diligence lews? In the list below, which categories of customers or ustries are subject to EDD and/or are restricted, or hibited by the Entity's FCC programme? | Please select Please select Please select Please select Please select Please select Please select Please select No Please select |
| is the Entity have policies, procedures and processes eview and escalate potential matches from screening tomers and connected parties to determine whether are PEPs, or controlled by PEPs? CYC renewed at defined frequencies based on risking (Periodic Reviews)? Yes, select all that apply: Less than one year 1 – 2 years 3 – 4 years 5 years or more Trigger-based or perpetual monitoring reviews Other (Please specify) as the Entity maintain and report metrics on current dipast periodic or trigger event due diligence lews? In the list below, which categories of customers or sustries are subject to EDD and/or are restricted, or hibited by the Entity's FCC programme? | Please select Please select Please select Please select Please select No Please select |
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| ng (Periodic Reviews)? yes, select all that apply: Less than one year 1 – 2 years 3 – 4 years 5 years or more Trigger-based or perpetual monitoring reviews Other (Please specify) as the Entity maintain and report metrics on current by past periodic or trigger event due diligence lews? In the list below, which categories of customers or sustries are subject to EDD and/or are restricted, or hibited by the Entity's FCC programme? | Please select Please select No Please select |
| Less than one year 1 – 2 years 3 – 4 years 5 years or more Trigger-based or perpetual monitoring reviews Other (Please specify) es the Entity maintain and report metrics on current destroy past periodic or trigger event due diligence lews? In the list below, which categories of customers or sustries are subject to EDD and/or are restricted, or hibited by the Entity's FCC programme? | Please select Please select No Please select |
| 1 – 2 years 3 – 4 years 5 years or more Trigger-based or perpetual monitoring reviews Other (Please specify) es the Entity maintain and report metrics on current if past periodic or trigger event due diligence iews? In the list below, which categories of customers or custries are subject to EDD and/or are restricted, or hibited by the Entity's FCC programme? | Please select Please select No Please select |
| 3 – 4 years 5 years or more Trigger-based or perpetual monitoring reviews Other (Please specify) as the Entity maintain and report metrics on current of past periodic or trigger event due diligence of iews? In the list below, which categories of customers or oustries are subject to EDD and/or are restricted, or hibited by the Entity's FCC programme? | Please select No Please select |
| 5 years or more Trigger-based or perpetual monitoring reviews Other (Please specify) as the Entity maintain and report metrics on current of past periodic or trigger event due diligence liews? In the list below, which categories of customers or custries are subject to EDD and/or are restricted, or hibited by the Entity's FCC programme? | No Please select |
| Trigger-based or perpetual monitoring reviews Other (Please specify) as the Entity maintain and report metrics on current of past periodic or trigger event due diligence lews? In the list below, which categories of customers or custries are subject to EDD and/or are restricted, or hibited by the Entity's FCC programme? | Please select |
| Other (Please specify) as the Entity maintain and report metrics on current of past periodic or trigger event due diligence lews? In the list below, which categories of customers or custries are subject to EDD and/or are restricted, or hibited by the Entity's FCC programme? | |
| es the Entity maintain and report metrics on current d past periodic or trigger event due diligence lews? m the list below, which categories of customers or ustries are subject to EDD and/or are restricted, or hibited by the Entity's FCC programme? | Please select |
| I past periodic or trigger event due diligence iews? In the list below, which categories of customers or ustries are subject to EDD and/or are restricted, or hibited by the Entity's FCC programme? | Please select |
| ustries are subject to EDD and/or are restricted, or hibited by the Entity's FCC programme? | |
| rms, defence, military | |
| | Please select |
| espondent Banks | Please select |
| If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? | Please select |
| mbassies/Consulates | Do not have this category of customer or industry |
| xtractive industries | Please select |
| ambling customers | Do not have this category of customer or industry |
| eneral Trading Companies | Please select |
| arijuana-related Entities | |
| | Do not have this category of customer or industry |
| SB/MVTS customers | Do not have this category of customer or industry |
| on-account customers | Please select |
| on-Government Organisations | Do not have this category of customer or industry |
| on-resident customers | Please select |
| uclear power | Do not have this category of customer or industry |
| ayment Service Providers | Do not have this category of customer or industry |
| EPs | Do not have this category of customer or industry |
| EP Close Associates | Do not have this category of customer or industry |
| EP Related | Do not have this category of customer or industry |
| recious metals and stones | Please select |
| ed light businesses/Adult entertainment | Do not have this category of customer or industry |
| egulated charities | Do not have this category of customer or industry |
| | |
| hell banks | Please select |
| ravel and Tour Companies | Do not have this category of customer or industry |
| nregulated charities | Do not have this category of customer or industry |
| sed Car Dealers | Do not have this category of customer or industry |
| irtual Asset Service Providers | Do not have this category of customer or industry |
| and (opacity) | |
| estricted, provide details of the restriction | |
| s | ed Car Dealers tual Asset Service Providers nor (specify) |



| 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. | |
| 5-2-27 | | |
| | MENT TRANSPARENCY | |
| 92 | Does the Entity adhere to the Wolfsberg Group | 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 sélect |
| 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 for | 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 sélect |
| 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 102 a1a | Are internal system of vendor-sourced tools used? If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? | Please select |
| 102 #2 | 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? | Ріваяй явівсі |
| 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 |
|-------|--|--|
| 06 | Select the Sanctions Lists used by the Entity in its sanctions screening processes: | A STATE OF THE STA |
| 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 effort The Financ legal and re The Financ | t to remain in full compliance with all applicable financial crime law all Institution understands the critical importance of having effecti egulatory obligations. | tion name) is fully committed to the fight against financial crime and makes re, regulations and standards in all of the jurisdictions in which it does business and holds accounts, rive and sustainable controls to combat financial crime in order to protect its reputation and to meet its reg 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 ial Institution understands the critical importance of having effect igulatory obligations. ial 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 effort The Financ legal and re The Financ standards. The Financ The Informa | to remain in full compliance with all applicable financial crime law ital Institution understands the critical importance of having effectingulatory obligations. Ital Institution recognises the importance of transparency regarding the institution 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. |
| every effort The Finance legal and re The Finance standards. The Finance The Information The Finance Danielle | to remain in full compliance with all applicable financial crime law its linstitution understands the critical importance of having effect egulatory obligations. It is a linstitution recognises the importance of transparency regarding its linstitution further certifies it complies with / is working to compation provided in this Wolfsberg CBDDQ will be kept current and its linstitution commits to file accurate supplemental information of a Savire | 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 offeri The Financ legal and re- The Financ standards. The Financ The Financ I, Daniella the answer- Institution. | to remain in full compliance with all applicable financial crime law is all Institution understands the critical importance of having effect gulatory obligations. It is institution recognises the importance of transparency regarding institution further certifies it complies with / is working to compation provided in this Wolfsberg CBDDQ will be kept current and itial Institution commits to file accurate supplemental information of a Savira (Global Head is provided in this Wolfsberg CBDDQ are complete and correct to mathan Subramanian (MLRQ or equivalent). | 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 offeri The Financ legal and re- The Financ standards. The Financ The Financ I, Daniella the answer- Institution. | to remain in full compliance with all applicable financial crime law is all Institution understands the critical importance of having effect gulatory obligations. It is institution recognises the importance of transparency regarding institution further certifies it complies with / is working to compation provided in this Wolfsberg CBDDQ will be kept current and itial Institution commits to file accurate supplemental information of a Savira (Global Head is provided in this Wolfsberg CBDDQ are complete and correct to mathan Subramanian (MLRQ or equivalent). | 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 offeri The Financ legal and re- The Financ standards. The Financ The Financ I, Daniella the answer- Institution. | to remain in full compliance with all applicable financial crime law is all Institution understands the critical importance of having effect gulatory obligations. It is institution recognises the importance of transparency regarding institution further certifies it complies with / is working to compation provided in this Wolfsberg CBDDQ will be kept current and itial Institution commits to file accurate supplemental information of a Savira (Global Head is provided in this Wolfsberg CBDDQ are complete and correct to mathan Subramanian (MLRQ or equivalent). | 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 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 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 a1b 19 a1c 19 a1d 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 (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 |

| 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 | No |
| 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 | |
| 14000000 | Low Price Securities | Please select |
| 19 g | The state of the s | 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 |
| 19 m | Stored Value Instruments | |
| 19 m | Stored value instruments Trade Finance | No Company of the Com |
| | | 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 | 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 |
| | Sale of Monetary Instruments | |
| 19 p4 | | 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 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 | L |
| 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 | Not applicable |
| Application of the second | The state of the s | |
| 22 e | CDD | Please select |
| 22 f | EDD | Please select |
| | | |
| 22 g | Independent Testing | Please select |
| 22 g 22 h | Independent Testing Periodic Review | Please select Please select |
| | | MILE PART (1996) MILE PART (1997) |
| 22 h 22 i | Periodic Review Policies and Procedures | Please select Please select |
| 22 h 22 i 22 j | Periodic Review Policies and Procedures PEP Screening | Please select Please select Please select |
| 22 h 22 i | Periodic Review Policies and Procedures | Please select Please select |

| 22 | Suspicious Activity Panartina | Places reject |
|--------------|---|--------------------|
| 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 of the flore | 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 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 (respectable from the Independent Auff Indicator)? 119 Control may be independent Auff Indicator)? 119 Control may be independent Auff Indicator)? 119 Control may be independent Auff Indicator)? 119 Control may be independent Auff Indicator)? 119 Control may be independent Auff Indicator)? 119 Control may be independent Auff Indicator)? 119 Control may be independent Auff Indicator of all the LE's branches because in the Indicator of the Indic | 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 expressible of all the St branches of the Compliance Testing process (separate from the independent Audit function) of all the St branches of the St | 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 services and services and services and services and services provides and process on a regular basis? 123 Per provide any additional information or other independent third party cover the following areas: 124 Informal Audit Department Place Per provides and process and provides and services programme by the following. 125 Per provides and services provided any additional information or procedures 126 Per provides and services provides and procedures and procedures are provided any additional information or procedures 127 Per provides and provides and procedures and procedures are provided any additional information provides and procedures and procedures are provided any additional information provides and provides and provides and procedures and provides and provides and provides and provides any additional information provides any additional information provides any additional information and the branchies that his applies to. 126 Pease select 127 Confirm that all responses provided in the above select and the branchies that his applies to. 128 Uses the Entily have policies in place addressing fraud risk? 129 Des the Entily have additional information provides any additional information provides any additional information provides any additional information provides any additional information provides any additional information provides any additional inf | | 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 |
| Information/context to the answers in this section. In addition to inspections by the government supervisorategulators, does the Entity have an internal audit function, a teating function or other content of the | 119 a | | |
| In addition to inspections by the government supervisorizerizegulators, does the Entity have an internal audit function, a testing function or other independent intrior party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? 122 | 120 | | |
| 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 | | |
| Fraud and Sanctions programme by the following: 122 b | AND DESCRIPTION OF THE PARTY OF | 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 | Please select |
| 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 |
| third party cover the following areas: 123 a | The second secon | | Please select |
| procedures Please select | | third party cover the following areas: | |
| 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 l Transaction Monitoring Please select 123 l Transaction Screening including for sanctions Please select 123 l Transaction Screening including for sanctions Please select 123 l Transaction Screening including for sanctions Please select 123 l Other (specify) 124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 126 If appropriate, provide any additional information/context to the answers in this section. 127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible 129 Does the Entity have a dedicated team responsible | | procedures | 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 123 g Suspicious Activity Filing Please select 123 h Technology Please select 123 l Transaction Monitoring Please select 123 l Transaction Screening including for sanctions Please select 123 k Training & Education Please select 123 l Other (specify) 124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 126 If appropriate, provide any additional information/context to the answers in this section. 127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible Please select 129 Does the Entity have a dedicated team responsible | The second secon | | |
| 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 l Transaction Monitoring Please select 123 l Transaction Monitoring Please select 123 l Transaction Screening including for sanctions Please select 123 l Transaction Screening including for sanctions Please select 123 l Other (specify) 124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 126 If appropriate, provide any additional information/context to the answers in this section. 127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible 128 Does the Entity have a dedicated team responsible | | | |
| 123 f Reporting/Metrics & Management Information Please select 123 g Suspicious Activity Filing Please select 123 h Technology Please select 123 l Transaction Monitoring Please select 123 j Transaction Screening including for sanctions Please select 123 k Training & Education Please select 123 l Other (specify) 124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 126 If appropriate, provide any additional information/context to the answers in this section. 127 Does the Entity have policies in place addressing fraud risk? Please select Please select Please select Please select | | | |
| 123 g Suspicious Activity Filing Please select 123 h Technology Please select 123 l Transaction Monitoring Please select 123 j Transaction Screening including for sanctions Please select 123 k Training & Education Please select 123 l Other (specify) 124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 126 If appropriate, provide any additional information/context to the answers in this section. 14. FRAUD 127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible | | Control of the Contro | AV 2017 C 470 PM 18 20 C |
| 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 |
| 123 Transaction Screening including for sanctions Please select 123 k Training & Education Please select 123 l Other (specify) 124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 126 If appropriate, provide any additional information/context to the answers in this section. 127 Does the Entity have policies in place addressing fraud risk? Please select 128 Does the Entity have a dedicated team responsible | 123 h | Technology | Please select |
| Training & Education Other (specify) Please select Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. Does the Entity have policies in place addressing fraud risk? Please select | | | 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 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 | | | |
| 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. FRAUD 17 Does the Entity have policies in place addressing fraud risk? 18 Does the Entity have a dedicated team responsible | | | Please select |
| 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. Id. FRAUD Toos the Entity have policies in place addressing fraud risk? Does the Entity have a dedicated team responsible Does the Entity have a dedicated team responsible | 124 | tracked to completion and assessed for adequacy | 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? 128 Does the Entity have a dedicated team responsible | 125 | | Please select |
| information/context to the answers in this section. 14. FRAUD 127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible | 125 a | If N, clarify which questions the difference/s relate to | |
| 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):

BANCO BILBAO VIZCAYA ARGENTARIA SA ITALY

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.

| 1. ENTITY & OWNERSHIP 1 Full Legal Name BANCO BILBAO VIZCAYA ARGENTARIA SA 2 Append a list of foreign branches which are covered by this questionnaire 3 Full Legal (Registered) Address CORSO GIACOMO MATTEOTTI 10, 20121, MILAN 4 Full Primary Business Address (if different from above) 5 Date of Entity incorporation/establishment 1982 6 Select type of ownership and append an ownership chart if available | | | |
|--|-----------|--|--|
| Full Legal Name Append a list of foreign branches which are covered by this questionnaire Append a list of foreign branches which are covered by this questionnaire Full Legal (Registered) Address CORSO GIACOMO MATTEOTTI 10, 20121, MILAN Full Primary Business Address (if different from dove) Full Primary Business Address (if different from dove) Date of Entity incorporation/establishment Select type of ownership and append an ownership other if available Ball Primary Business Address (if different from dove) Select type of ownership and append an ownership other if available Ball Primary Business Address (if different from dove) | No# | Question | Answer |
| Append a list of foreign branches which are covered by this questionnaire Pull Legal (Registered) Address CORSO GIACOMO MATTEOTTI 10, 20121, MILAN Full Primary Business Address (if different from above) Date of Entity incorporation/establishment Select type of ownership and append an ownership chart if available B Select type of ownership and append an ownership chart if available B Publicly Traded (25% of shares publicly traded) B Publicly Traded (25% of shares publicly traded) B Member OwnedMultial Fire Government or State Owned by 25% or more B G Government or State Owned by 25% or more G J Provise details of sharesholders or ultimate beneficial owners with a holding of 10% or more B Does the Entity's total shares composed of bearer shares B Does the Entity for any of its branches, operate under an Offshore Banking License or provide services only through online channels? Please select Ple | 1. ENTITY | & OWNERSHIP | |
| 2 Append a list of foreign branches which are covered by this questionnaire 3 Full Legal (Registered) Address CORSO GIACOMO MATTEOTTI 10, 20121, MILAN 4 Full Primary Business Address (if different from 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 a Publicly Traded (25% of shares publicly traded) 6 at If y, indicate the exchange traded on and ticker symbol 6 b Member OwnedMutual 6 b Government or State Owned by 25% or more 6 d Pivally Owned 6 d Pivally Owned 7 So of the Entity, or any of its branches, operate under an Offshore Banking Lucines (OBL)? 7 So of the Entity, or any of its branches, operate under an Offshore Banking Lucines (OBL)? 8 Does the Entity, or any of its branches, operate under an Offshore Banking Lucines (OBL)? 9 Does the Bank have a Virtual Bank License or provide services only through online channels? 10 Name of primary financial regulator/supervisory authority 11 Provide Legal Entity Identifier (LEI) if available | 1 | Full Legal Name | BANCO BILBAO VIZCAYA ARGENTARIA SA |
| by this questionnaire Full Legal (Registered) Address CORSO GIACOMO MATTEOTTI 10, 20121, MILAN Full Primary Business Address (if different from above) Date of Entity incorporation/establishment 1992 Salect type of ownership and append an ownership chart if available a Publicly Traded (25% of shares publicly traded) Full Fy incident the exchange traded on and ticker symbol Member Owned/Mutual Full Fy incident the exchange traded on and ticker symbol Member Owned/Mutual Full Registered (25% of shares publicly traded) Flease select Government or State Owned by 25% or more Please select Government or State Owned by 25% or more Please select Full Fy provide details of shareholders or ultimate breneficial owners with a holding of 10% or more Flease select Full Fy provide details of shareholders or ultimate breneficial owners with a holding of 10% or more The Entity's total shares composed of bearer shares Boos the Entity, or any of its branches, operate under an Offshore Banking License (OBL)? Flease select Flease select Please select Please select Flease select Please select Please select Flease select Please select Please select Flease select Please select Flease select Please select Flease select | | | |
| Select type of covereship and append an ownership cheri if variables the schange traded on and ticker symbol 5 Date of Entity incorporation/establishment 1992 5 Date of Entity incorporation/establishment 1992 6 Select type of covereship and append an ownership cheri if variables of the schange traded on and ticker symbol 6 Publicly Traded (25% of shares publicly traded) No | | | |
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| unicient nom the Entity completing the DDQ) | 12 | | |
| | | different from the Entity completing the DDQ) | |
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| 13 | Jurisdiction of licensing authority and regulator of | |
|----------|---|-----------------|
| | ultimate parent | |
| | | |
| 14 | Select the business areas applicable to the Entity | |
| 14 a | Retail Banking | Yes |
| 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 | No |
| 14 g | Securities Services/Custody | No |
| 14 h | Broker/Dealer | No No |
| 14 i | Multilateral Development Bank | No 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) | Please select |
| 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 | 51-200 |
| 16 b | Total Assets | Please select |
| 17 | Confirm that all responses provided in the above | 1 least solitor |
| | 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. | |
| 2. PRODU | CTS & SERVICES | |
| 19 | Does the Entity offer the following products and services: | |
| 19 a | Correspondent Banking | No 🗖 |
| 19 a1 | If Y | |
| 19 a1a | Does the Entity offer Correspondent Banking | Please select |
| 19 a1b | services to domestic banks? Does the Entity allow domestic bank clients to | Please select |
| 19 a1c | provide downstream relationships? 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 |
| | | 1 |

| 19 a1i | Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs? | Please select |
|----------|---|----------------|
| 10 h | | N ₁ |
| 19 b | Cross-Border Bulk Cash Delivery | No |
| 19 c | Cross-Border Remittances | No |
| 19 d | Domestic Bulk Cash Delivery | No 🖃 |
| 19 e | Hold Mail | No 🖂 |
| 19 f | International Cash Letter | No . |
| 19 g | Low Price Securities | No . |
| 19 h | Payable Through Accounts | No 🖃 |
| 19 i | Payment services to non-bank entities who may | |
| | then offer third party payment services to their customers? | 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) | No |
| 19 I | Sponsoring Private ATMs | No |
| 19 m | Stored Value Instruments | No 🗔 |
| 19 n | Trade Finance | Please select |
| 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 | Please select |
| 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 |
| | 7 | Please select |
| 19 p3 | Foreign currency conversion | |
| 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. | |
| 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. | |
| 3. AMI 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 | 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 |
| 22 I | Sanctions | Please select |
| | | . 10000 001001 |

| 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. | All the main policies come from the Group, in case of a stricter approach is requested, we implement local procedures |
| 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 h | Corruption risks associated with the sountries and | |
|--|--|--|
| 40 b | Corruption risks associated with the countries and | |
| | industries in which the Entity does business, directly or through intermediaries | Please select |
| | , and the second | |
| 40 c | Transactions, products or services, including those | |
| | that involve state-owned or state-controlled entities | Please select |
| | or public officials | |
| 40 d | Corruption risks associated with gifts and | |
| | hospitality, hiring/internships, charitable donations | Please select |
| | and political contributions | |
| 40 e | Changes in business activities that may materially | |
| 700 | increase the Entity's corruption risk | Please select |
| 41 | Does the Entity's internal audit function or other | |
| 41 | independent third party cover ABC Policies and | Disease select |
| | 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 | Please select |
| | subject to ABC risk have been outsourced | Please select |
| 42 f | Non-employed workers as appropriate | Planadat |
| | (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. | |
| | and the branen, so that the applies to. | |
| | | |
| | | |
| 45 | If appropriate, provide any additional | |
| | information/context to the answers in this section. | |
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| 5. AML, CT | F & SANCTIONS POLICIES & PROCEDURES | |
| 5. AML, CT | F & SANCTIONS POLICIES & PROCEDURES Has the Entity documented policies and procedures | |
| | F & SANCTIONS POLICIES & PROCEDURES Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions | |
| | Has the Entity documented policies and procedures | |
| | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions | |
| 46 | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: | Please select |
| 46 46 a | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering | Please select Please select |
| 46 a 46 b | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing | Please select |
| 46 a 46 b 46 c | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations | |
| 46 a 46 b | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at | Please select |
| 46 a 46 b 46 c 47 | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? | Please select Please select |
| 46 a 46 b 46 c | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and | Please select Please select |
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| 46 a 46 b 46 c 47 48 48 a 48 a | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? | Please select Please select Please select No No |
| 46 a 46 b 46 c 47 48 a 48 a 48 a 1 48 b | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards | Please select Please select Please select No |
| 46 a 46 b 46 c 47 48 a 48 a 48 a 1 48 b 48 b 1 | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? | Please select Please select Please select No No |
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| 46 a 46 b 46 c 47 48 a 48 a 48 a 1 48 b 48 b 1 | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous | Please select Please select No No Please select Please select |
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| 46 a 46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d 49 e | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for Section 311 designated entities | Please select Please select No No No Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select |
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| 46 a 46 b 46 c 47 48 48 a 48 a 48 b 49 a 49 b 49 c 49 d 49 e 49 f 49 g | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Pose the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Assess the risks of relationships with domestic and | Please select Please select No No No 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 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. | |
| | If appropriate, provide any additional | |
| 53 | information/context to the answers in this section. | For US Standards, at a pure Local Italian Level we ensure and formalise, locally, the compliance of our local policies and procedures to the EU and Italian Standards, we assume that the US side is covered at a Group / headquarter Level. |
| | information/context to the answers in this section. | our local policies and procedures to the EU and Italian Standards, we assume that the US side is |
| | information/context to the answers in this section. F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the | our local policies and procedures to the EU and Italian Standards, we assume that the US side is |
| 6. AML, CTI 54 | information/context to the answers in this section. F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: | our local policies and procedures to the EU and Italian Standards, we assume that the US side is covered at a Group / headquarter Level. |
| 6. AML, CTI 54 | information/context to the answers in this section. F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client | our local policies and procedures to the EU and Italian Standards, we assume that the US side is covered at a Group / headquarter Level. Please select |
| 6. AML, CTI 54 54 a 54 b | F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product | our local policies and procedures to the EU and Italian Standards, we assume that the US side is covered at a Group / headquarter Level. Please select Please select |
| 6. AML, CTI 54 54 a 54 b 54 c | information/context to the answers in this section. F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel | our local policies and procedures to the EU and Italian Standards, we assume that the US side is covered at a Group / headquarter Level. Please select Please select Please select |
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| 6. AML, CTI 54 54 a 54 b 54 c 54 d | information/context to the answers in this section. F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the | our local policies and procedures to the EU and Italian Standards, we assume that the US side is covered at a Group / headquarter Level. Please select Please select Please select |
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| 6. AML, CTI 54 54 a 54 b 54 c 54 d 55 55 | information/context to the answers in this section. F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring | our local policies and procedures to the EU and Italian Standards, we assume that the US side is covered at a Group / headquarter Level. Please select Please select Please select Please select Please select |
| 6. AML, CTI 54 54 a 54 b 54 c 54 d 55 55 a 55 b | information/context to the answers in this section. F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence | our local policies and procedures to the EU and Italian Standards, we assume that the US side is covered at a Group / headquarter Level. Please select Please select Please select Please select Please select Please select Please select |
| 6. AML, CTI 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c | information/context to the answers in this section. F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification | our local policies and procedures to the EU and Italian Standards, we assume that the US side is covered at a Group / headquarter Level. Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select |
| 6. AML, CTI 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e | information/context to the answers in this section. F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education | our local policies and procedures to the EU and Italian Standards, we assume that the US side is covered at a Group / headquarter Level. Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select |
| 6. AML, CTI 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e | information/context to the answers in this section. F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance | our local policies and procedures to the EU and Italian Standards, we assume that the US side is covered at a Group / headquarter Level. 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 |
| 6. AML, CTI 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h | information/context to the answers in this section. F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information | our local policies and procedures to the EU and Italian Standards, we assume that the US side is covered at a Group / headquarter Level. 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 |
| 6. AML, CTI 54 54 a 54 b 54 c 54 d 55 b 55 c 55 d 55 c 55 f 55 f 55 f 55 f 56 | information/context to the answers in this section. F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? | our local policies and procedures to the EU and Italian Standards, we assume that the US side is covered at a Group / headquarter Level. 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 |
| 6. AML, CTI 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h | information/context to the answers in this section. F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed | our local policies and procedures to the EU and Italian Standards, we assume that the US side is covered at a Group / headquarter Level. 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 |
| 6. AML, CTI 54 54 a 54 b 54 c 54 d 55 b 55 c 55 d 55 c 55 f 55 f 55 f 55 f 56 | information/context to the answers in this section. F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF | our local policies and procedures to the EU and Italian Standards, we assume that the US side is covered at a Group / headquarter Level. 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 |
| 6. AML, CTI 54 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 d 55 e 55 f 55 f 55 6 56 a | F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. | our local policies and procedures to the EU and Italian Standards, we assume that the US side is covered at a Group / headquarter Level. 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 |
| 6. AML, CTI 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a | information/context to the answers in this section. F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. | our local policies and procedures to the EU and Italian Standards, we assume that the US side is covered at a Group / headquarter Level. Please select |
| 6. AML, CTI 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 f 55 g 55 h 56 56 a | information/context to the answers in this section. F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client | our local policies and procedures to the EU and Italian Standards, we assume that the US side is covered at a Group / headquarter Level. Please select |
| 6. AML, CTI 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a | information/context to the answers in this section. F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography | our local policies and procedures to the EU and Italian Standards, we assume that the US side is covered at a Group / headquarter Level. Please select |
| 6. AML, CTI 54 54 a 54 b 54 c 54 d 55 b 55 c 55 d 55 c 55 f 55 f 55 6 56 a | information/context to the answers in this section. F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel | our local policies and procedures to the EU and Italian Standards, we assume that the US side is covered at a Group / headquarter Level. Please select |
| 6. AML, CTI 54 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 d 55 e 55 f 55 f 55 7 57 a 57 a 57 d 58 | information/context to the answers in this section. F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls | our local policies and procedures to the EU and Italian Standards, we assume that the US side is covered at a Group / headquarter Level. Please select |
| 6. AML, CTI 54 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 f 55 f 55 f 57 d 57 a 57 d 58 58 a 58 a | information/context to the answers in this section. F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance | our local policies and procedures to the EU and Italian Standards, we assume that the US side is covered at a Group / headquarter Level. Please select |
| 6. AML, CTI 54 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 d 55 e 55 f 55 f 55 7 57 a 57 a 57 d 58 | information/context to the answers in this section. F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence | our local policies and procedures to the EU and Italian Standards, we assume that the US side is covered at a Group / headquarter Level. Please select |

| | T | |
|------------|--|-----------------------------|
| 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? | |
| 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. If appropriate, provide any additional | |
| | information/context to the answers in this section. | |
| 7. KYC, CI | 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: | 1 IOGGO GOIGGE |
| 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 | Please select |
| 67 a | receiving a risk classification? If Y, what factors/criteria are used to determine the | 1 reads soled |
| | 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 | Other | Please select |
| 68 a4a | If yes, please specify "Other" | |
| 69 | Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? | Please select |
| 69 a | If Y, is this at: | Diagon polant |
| 69 a1 | Onboarding | Please select |
| 69 a2 | KYC renewal | Please select |

| T | | |
|-------|--|--|
| 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 | 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) | |
| 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 | 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 | |
| | | |
| 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 | Do not have this category of customer or industry |
| 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 | 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 Do not have this category of customer or industry |
| 76 W | Virtual Asset Service Providers | |
| 76 y | 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 |

| | Trever en al company | |
|----------|---|---|
| 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. | we identify the beneficial owners according to the italian AML legislation, and require the ID documents as appropriate |
| 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? | |
| 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. PAYME | NT TRANSPARENCY | |
| 92 | Does the Entity adhere to the Wolfsberg Group | Disease select |
| | Payment Transparency Standards? | Please select |

| 93 | Does the Entity have policies, procedures and | |
|----------|---|-----------------|
| | processes to comply with and have controls in place | |
| İ | to ensure compliance with: | |
| 93 a | FATF Recommendation 16 | Diseases |
| | | Please select |
| 93 b | Local Regulations | Please select |
| 93 b1 | If Y, specify the regulation | |
| | | |
| | | |
| | | |
| 93 c | If N, explain | |
| 93 C | II IV, explain | |
| | | |
| | | |
| | | |
| 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 | |
| 33 | of required beneficiary information cross-border | |
| | payment messages? | Please select |
| | | |
| 95 a | If Y, does the Entity have procedures to include | |
| 1 | beneficiary address including country in cross | Please select |
| İ | border payments? | |
| 96 | Confirm that all responses provided in the above | |
| 1 | Section are representative of all the LE's branches | Please select |
| 96 a | • | |
| 30 d | If N, clarify which questions the difference/s relate to | |
| İ | 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 | 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 | 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 | 1 least stillet |
| İ | and/or masking, of sanctions relevant information in | |
| 1 | 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 |
| İ | against Sanctions Lists? | |
| 400 | | |
| 102 | What is the method used by the Entity for sanctions | Please select |
| | screening? | 1100000000 |
| 102 a | If 'automated' or 'both automated and manual' | |
| İ | 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) | |
| 103 | Does the Entity screen all sanctions relevant data, | |
| 103 | 1 | |
| | including at a minimum, entity and location | Please select |
| | information, contained in cross border transactions | |
| | against Sanctions Lists? | |
| 104 | What is the method used by the Entity? | Please select |
| 104 | | |

| 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 | Disconnelled |
| | Sanctions List (UN) | Please select |
| 106 b | United States Department of the Treasury's Office of | Plance colort |
| | Foreign Assets Control (OFAC) | Please select |
| 106 с | Office of Financial Sanctions Implementation HMT | Please select |
| | (OFSI) | Fledse 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 | Please select |
| | comprehensive jurisdiction-based Sanctions? | |
| 109 | Confirm that all responses provided in the above | |
| 1.00 | 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. TRAININ | G & EDUCATION | |
| 11. TRAININ | Does the Entity provide mandatory training, which | |
| 111 | Does the Entity provide mandatory training, which includes: | |
| | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to | Please select |
| 111 111 a | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities | Please select |
| 111 | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, | Please select |
| 111 111 a | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant | |
| 111 111 a | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, | Please select Please select |
| 111 a 111 b | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered | |
| 111 111 a | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, | |
| 111 a 111 b 111 c | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations | Please select |
| 111 a 111 b | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant | Please select |
| 111 a 111 b 111 c 111 d | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations | Please select Please select Please select |
| 111 a 111 b 111 c 111 d 111 e | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant | Please select Please select Please select Please select |
| 111 a 111 a 111 b 111 c 111 d 111 e 111 f | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud | Please select Please select Please select |
| 111 a 111 b 111 c 111 d 111 e | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: | Please select Please select Please select Please select Please select |
| 111 a 111 a 111 b 111 c 111 d 111 e 111 f 112 | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud | Please select Please select Please select Please select |
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| 111 a 111 a 111 b 111 c 111 d 111 e 111 f 112 a 112 b 112 c 112 d 112 e 112 f 113 | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture 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, CTF and Sanctions staff? | 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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| Does the Entity have a program wide ink based Quality Assaurance programs from the independent Audit function) | 116 | 1 11 1 21 | In addition to the BBVA Group training, we locally provide for annual class-room training sessions to all the employees of the Branch on Financial Crime related topics suc as: AML / CFT / Sanctions & Embargoes etc |
| Quality Assurance programme for financial crime (separate from the Independent Audit London)? 188 Does the Entity have a program wide risk based Compliance Testing process (separate from the Independent Audit London)? 199 Confirm that all irresponses provided in the above Section are representative of all the LFs branches 190 If appropriate, provide any additional information informat | 12. QUALIT | TY ASSURANCE /COMPLIANCE TESTING | |
| (ceputate from the Independent Audit function)? Please select | 117 | Does the Entity have a program wide risk based | |
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| 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? | 120 | | |
| supervisors/regulators, does the Entity have an internal audit function or other independent third party, or both, that assesses FCC AML_CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? Please select 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 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 a Covernance 123 b Enterprise Wide Risk Assessment Please select 123 c Governance Please select Please select 123 a Name Screening & List Management Please select 123 a Name Screening & List Management information Please select 123 g Suspicious Activity Filing Please select 123 g Suspicious Activity Filing Please select Please select Please select Please select Please select 123 a Transaction Monitoring Please select Please sele | 13. AUDIT | | |
| Fraud and Sanctions programme by the following: 122 a Internal Audit Department Please select 123 b External Third Party Please select 124 c Sexternal Third Party Please select 125 a MAIL_CTF, ABC, Fraud and Sanctions policy and procedures 126 c Governance 127 d Sexternal Sexternal Please select 127 d Sexternal Sexternal Please select 128 d Sexternal Sexternal Please select 129 d Sexternal Sexternal Please select 129 d Sexternal Sexternal Please select 120 d Sexternal Se | 121 | 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 | Please select |
| 122 b External Third Party Please select 123 c 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/CDDED and underlying methodologies Please select 123 d KYC/CDDED and underlying methodologies Please select 123 e Name Screening & List Management Please select 123 f Reporting/Metrics & Management Information Please select 123 g Suspicious & Kruity Filing Please select 123 g Suspicious & Kruity Filing Please select 123 l Transaction Monitoring Please select 123 l Transaction Screening including for sanctions Please select 123 l Transaction Screening including for sanctions Please select 123 l Transaction Screening including for sanctions Please select 123 l Other (specify) 124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 126 If appropriate, provide any additional information/context to the answers in this section. 127 Does the Entity have policies in place addressing fraud risk? Does the Entity have a dedicated team responsible 128 Does the Entity have a dedicated team responsible 129 Does the Entity have a dedicated team responsible | 122 | | |
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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. FRAU | D | |
| , Diagon coloct | | Does the Entity have policies in place addressing | Please select |
| | 128 | · · | 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. | |
| Declarat | tion Statement | |
| Wolfsberg (| tion Statement Group Correspondent Banking Due Diligence Questionnaire 2023 (CBI Statement (To be signed by Global Head of Correspondent Banky Laundering, Chief Compliance Officer, Global Head of Financia | ring or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of |
| Wolfsberg C Declaration Anti- Mone | Group Correspondent Banking Due Diligence Questionnaire 2023 (CBI n Statement (To be signed by Global Head of Correspondent Bank by Laundering, Chief Compliance Officer, Global Head of Financial Milan Branch | ring or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of |
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| Wolfsberg (Declaration Anti- Mone BBVA S.A every effort The Finance legal and no The Finance standards. The Finance | Group Correspondent Banking Due Diligence Questionnaire 2023 (CB in Statement (To be signed by Global Head of Correspondent Banking Laundering, Chief Compliance Officer, Global Head of Financial Milan Branch It to remain in full compliance with all applicable financial crime laws cial Institution understands the critical importance of having effective egulatory obligations. | ting or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of I Crimes Compliance OR equivalent) 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. 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. |

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

I, RUBENS SANNA (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)

(Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that

N.A.

Institution.

24/11/2023

RUBENS SANNA

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 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. | |
| 4 441 | | |
| 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 1000 0000 |
| 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 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 | 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 Y DIE LONG MAN |
| 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 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 a 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 Geography | 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 |
| 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 |
| 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 |
| 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 |

| 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 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 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 |
| 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 | 4 | Please select |
| 76 j | | Please select |
| 76 k | | Please select |
| 76 I | The same of the sa | |
| 76 m | | Please select Please select |
| 76 n | | NCS-1-1-1-1-1 |
| 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. |
| every effort The Financ legal and re The Financ standards. The Financ | to remain in full compliance with all applicable financial crime laws all Institution understands the critical importance of having effecting gulatory obligations. al Institution recognises the importance of transparency regarding | 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. |
| every effort The Financ legal and re The Financ standards. The Financ The informa | 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 comply | 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. Will be updated no less frequently than every eighteen months. |
| every effort The Financ legal and re The Financ standards. The Financ The informa The Financ | 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 | 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. f Correspondent Banking or equivalent), certify that I have read and understood this declaration, that |
| 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 of | 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. If it is updated no less frequently than every eighteen months. |
| every effort The Financ legal and re The Financ standards. The Financ The Financ The Financ I, N/A the answers Institution. I, Marek I | 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 the provided in this Wolfsberg CBDDQ are complete and correct to compliance & AML Germany (MLRO or equitable) | 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. Ill 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 valent), certify that I have read and understood this forms the provided in this |
| 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 | 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 the provided in this Wolfsberg CBDDQ are complete and correct to compliance & AML Germany (MLRO or equitable) | 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. If the 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 |
| 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 & | 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 equitable). | 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) :

Banco Bilbao Vizcaya Argentaria S.A., London Branch

United Kingdom

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

| No# | Question | Answer |
|-----------|--|---|
| 1. ENTITY | & OWNERSHIP | |
| 1 | Full Legal Name | 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., London Branch |
| 3 | Full Legal (Registered) Address | One Canada Square, 44th Floor Canary Wharf London E14 5AA United Kingdom |
| 4 | Full Primary Business Address (if different from above) | |
| 5 | Date of Entity incorporation/establishment | London Branch established in 1918 |
| 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 | Theast still |
| 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 | Financial Conduct Authority & Prudential Regulatory Authority |
| 11 | Provide Legal Entity Identifier (LEI) if available | 5493000ITT4HB63XLV65 |
| 12 | Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ) | |
| | | 1 |

| 13 | Jurisdiction of licensing authority and regulator of | |
|----------|--|---------------|
| | ultimate parent | Spain |
| | | |
| | | |
| 14 | Select the business areas applicable to the Entity | |
| 14 a | Retail Banking | Please select |
| 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 | 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 | FICASC SCICUL |
| | resident in a different jurisdiction to the location where bank services are provided) | |
| | where bank services are provided) | |
| 15 a | If Y, provide the top five countries where the non- | |
| | resident customers are located. | |
| | | |
| | | |
| 16 | Select the closest value: | |
| 16 a | Number of employees | 51-200 |
| 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. | |
| | | |
| | | |
| 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 | |
| | services: | |
| 19 a | Correspondent Banking | No |
| 19 a1 | If Y | |
| 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 | Please select |
| | domestic banks? | |
| 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 | Please select |
| | foreign banks? | |
| 19 a1g | Does the Entity offer Correspondent Banking | |
| | services to regulated Money Services Businesses | Please select |
| | (MSBs)/Money Value Transfer Services (MVTSs)? | |
| 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 |
| | 1 | 1 |

| 19 a1i | Does the Entity have processes and procedures | |
|---|--|--|
| | in place to identify downstream relationships with | Please select |
| | MSBs /MVTSs/PSPs? | I leade defect |
| | | |
| 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 | Please select |
| 19 f | International Cash Letter | Please select |
| | | |
| 19 g | Low Price Securities | Please select |
| 19 h | Payable Through Accounts | Please select |
| 19 i | Payment services to non-bank entities who may | |
| 101 | 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 | Please select |
| 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: | |
| 10 m1 | Charle sophing convice | No |
| 19 p1 | Check cashing service | |
| 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 | l No |
| | - · | |
| 19 p3a | If yes, state the applicable level of due diligence | Please select |
| | | Please select No |
| 19 p4 | Sale of Monetary Instruments | No |
| 19 p4 19 p4a | Sale of Monetary Instruments If yes, state the applicable level of due diligence | |
| 19 p4 | Sale of Monetary Instruments | No |
| 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 | No |
| 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 | No |
| 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 | No Please select |
| 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 Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to | No Please select |
| 19 p4 19 p4a 19 p5 19 p5 20 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. | No Please select |
| 19 p4 19 p4a 19 p5 19 p5 20 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. | No Please select |
| 19 p4 19 p4a 19 p5 19 p5 20 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. | No Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT | 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. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: | No Please select Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C7 22 | 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. F & 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 | No Please select Please select Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT | 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. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: | No Please select Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C7 22 22 a 22 b | 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. FF & 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 | No Please select Please select Please select Please select Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C7 22 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. F & 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 | No Please select Please select Please select Please select Please select Please select Please select |
| 19 p4 19 p4a 19 p5 19 p5 20 20 a 21 3. AML, CT 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. F & 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 | No Please select Please select Please select Please select Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C7 22 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. F & 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 | No Please select Please select Please select Please select Please select Please select Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT 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. F & 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 | No Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f | 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. F & 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 | No 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 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C7 22 22 a 22 b 22 c 22 d 22 e 22 f 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. F & 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 | No 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 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f | 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. F & 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 | No 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 p4 19 p4a 19 p5 19 p5 20 20 a 21 3. AML, CT 22 22 b 22 c 22 c 22 d 22 e 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. F & 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 | No 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 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c 22 d 22 c 22 f 22 g 22 h 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. F & 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 | No 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 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C7 22 22 a 22 b 22 c 22 d 22 e 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. F & 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 | No Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c 22 d 22 c 22 f 22 g 22 h 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. F & 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 | No 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 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C7 22 22 a 22 b 22 c 22 d 22 e 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. F & 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 | No Please select |

| 22 m | Suspicious Activity Reporting | Please select |
|-----------|---|---------------|
| 22 m | 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 E | 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? | 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 | |
|---|--|---|
| 40 B | Corruption risks associated with the countries and industries in which the Entity does business, directly | Disease select |
|] | or through intermediaries | Please select |
| 40.0 | , and the second | |
| 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 | Please select |
| | increase the Entity's corruption risk | |
| 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 |
| 40.6 | - | |
| 42 f | Non-employed workers as appropriate (contractors/consultants) | Please select |
| 42 | , | |
| 43 | Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities? | Please select |
| 44 | | |
| 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 | |
| 44 a | and the branch/es that this applies to. | |
| | and the branchives that this applies to. | |
| | | |
| 45 | If any and the control of the contro | |
| 45 | If appropriate, provide any additional information/context to the answers in this section. | |
| | iniornation/context to the answers in this section. | |
| | | |
| | | |
| F A MIL OT | E A CANOTIONO DOLLOIDO A DECOCEDURES | |
| | F & SANCTIONS POLICIES & PROCEDURES | |
| 5. AML, CT | Has the Entity documented policies and procedures | |
| | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions | |
| | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, | |
| 46 | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: | |
| 46 46 a | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering | Please select |
| 46 a 46 b | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing | Please select |
| 46 a 46 b 46 c | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations | |
| 46 a 46 b | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at | Please select |
| 46 a 46 b 46 c 47 | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? | Please select Please select |
| 46 a 46 b 46 c | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and | Please select Please select |
| 46 a 46 b 46 c 47 | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: | Please select Please select Please select |
| 46 a 46 b 46 c 47 48 a 48 a | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards | Please select Please select Please select Please select |
| 46 a 46 b 46 c 47 48 a 48 a 48 a 1 | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? | Please select Please select Please select Please select Please select Please select |
| 46 a 46 b 46 c 47 48 a 48 a 48 a 1 48 b | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards | Please select Please select Please select Please select Please select Please select Please select Please select |
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| 46 a 46 b 46 c 47 48 48 a 48 a 48 b 49 b 49 c 49 d | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks | 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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| 46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b 49 b 49 c 49 d 49 e | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for Section 311 designated entities | 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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| 46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 49 a 49 a 49 b 49 c 49 d 49 e 49 f 49 g | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for Section 311 designated entities | 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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| 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 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. | |
| | | |
| C ANN CTE | FOR CANCETONIC DICK ACCEPCIMENT | |
| 6. AML, CTF | F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: | |
| 54 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: | Diagonal estate |
| 54 54 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client | Please select Please select |
| 54 a 54 b | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product | 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 | 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 Channel Geography Does the Entity's AML & CTF EWRA cover the | Please select Please select |
| 54 a 54 b 54 c 54 d 55 d 55 d 55 a 55 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: | Please select Please select Please select |
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| 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 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 b 54 c 55 d 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 |
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| 54 a 54 b 54 c 55 d 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 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 |
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| 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 56 57 a 57 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the 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 |
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| 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 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 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 |

| 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? | |
| 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. If appropriate, provide any additional | |
| | information/context to the answers in this section. | |
| 7. KYC, CI | 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: | FIEdase aciecul |
| 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 | |
| 66 | 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: | |
| 67.01 | 11.2 | Disconsist |
| 67 a1 | Product Usage | Please select |
| 67 a2 | Geography | Please select |
| 67 a3 | Business Type/Industry | Please select |
| 67 a4 | Legal Entity type Adverse Information | Please select |
| 67 a5 | | 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 | Other | Please select |
| 68 a4a | If yes, please specify "Other" | |
| 69 69 a | Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? If Y, is this at: | Please select |
| 69 a 69 a1 | | Places select |
| | Onboarding KYC renewal | 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 | Flease 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 | 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 74 a2 | Less than one year | Please select |
| 74 a2 74 a3 | 1 – 2 years 3 – 4 years | Please select 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 | EDD on risk-based approach |
| 76 d | Extractive industries | Please select |
| 76 e | Gambling customers | Please select |
| 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 | 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 | Do not have this category of customer or industry |
| 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 | 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 | Please select |
| 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 | 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/ | |

| | I 1674: 15 4 1 1 1 1 | |
|-----------|---|---|
| 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. MONITO | 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? | Combination of automated and manual |
| 84 a | If manual or combination selected, specify what type of transactions are monitored manually | In addition to the automated monitoring provided by Group-level systems, the Compliance Department of the London Branch undertakes sample testing of transactions that are high value or have a nexus to high risk jurisdictions. |
| 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. PAYME | NT 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 | |
| İ | to ensure compliance with: | |
| 93 a | FATF Recommendation 16 | Disease select |
| | | Please select |
| 93 b | Local Regulations | Please select |
| 93 b1 | If Y, specify the regulation | |
| | | |
| | | |
| | | |
| 93 c | If N, explain | |
| 93 C | II IV, explain | |
| | | |
| | | |
| | | |
| 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 | |
| 33 | of required beneficiary information cross-border | |
| | payment messages? | Please select |
| | | |
| 95 a | If Y, does the Entity have procedures to include | |
| 1 | beneficiary address including country in cross | Please select |
| İ | border payments? | |
| 96 | Confirm that all responses provided in the above | |
| 1 | Section are representative of all the LE's branches | Please select |
| 96 a | • | |
| 30 d | If N, clarify which questions the difference/s relate to | |
| İ | 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 | 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 | 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 | 1 lease select |
| İ | and/or masking, of sanctions relevant information in | |
| 1 | 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 |
| İ | against Sanctions Lists? | |
| 400 | | |
| 102 | What is the method used by the Entity for sanctions | Please select |
| | screening? | 1100000000 |
| 102 a | If 'automated' or 'both automated and manual' | |
| İ | 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) | |
| 103 | Does the Entity screen all sanctions relevant data, | |
| 103 | 1 | |
| | including at a minimum, entity and location | Please select |
| | information, contained in cross border transactions | |
| | against Sanctions Lists? | |
| 104 | What is the method used by the Entity? | Please select |
| 104 | | |

| | _ _ | |
|----------------|--|---|
| 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) | Lists maintained by the UK Office of Financial Sanctions Implementation |
| 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. TRAINI | ING & 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: Board and Senior Committee Management | Places extent |
| 112 a 112 b | 1st Line of Defence | Please select Please select |
| 112 b | 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 |

| 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. | |
| | | |
| | 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 | Please select |
| 123 a | third party cover the following areas: | |
| | AML, CTF, ABC, Fraud and Sanctions policy and procedures | Please select |
| 123 b 123 c | Enterprise Wide Risk Assessment Governance | Please select 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 123 k | Transaction Screening including for sanctions Training & Education | Please select Please select |
| 123 I | Other (specify) | Prease 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)

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

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)

Banco Bilbao Vizcaya Argentaria S.A., London 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.

(Signature & Date)

24 / 11 / 2023

(Signature & Date)



Financial Institution Name: Location (Country) :

Banco Bilbao Vizcaya Argentaria, S.A.,Tokyo 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 |
|-----------|--|---------------------------|
| 1. ENTITY | & OWNERSHIP | |
| 1 | Full Legal Name | |
| | | |
| | | |
| | | |
| 2 | Append a list of foreign branches which are covered | |
| | by this questionnaire | Tokyo |
| | | |
| | | |
| 3 | Full Legal (Registered) Address | |
| | The an adjust (10 gloto) out / 10 all out | |
| | | |
| | | |
| 4 | Full Primary Business Address (if different from | |
| 7 | above) | |
| | | |
| | | |
| 5 | Date of Entity incorporation/establishment | |
| | Date of Littly incorporation/establishment | |
| | | |
| | | |
| 6 | Select type of ownership and append an ownership | |
| 8 | 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 | Flease Select |
| o a i | 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 | 1 lease solect |
| | 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 | |
| ٥ | 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 | Financial Services Agency |
| | | |
| | | |
| 11 | Provide Legal Entity Identifier (LEI) if available | |
| 1 | | |
| | | |
| | | |
| 12 | Provide the full legal name of the ultimate parent (if | |
| | different from the Entity completing the DDQ) | |
| | , | |
| | | |
| L | 1 | <u> </u> |

| 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 | No |
| | <u> </u> | |
| 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 | Please select |
| 14 j | Wealth Management | No |
| 14 k | Other (please explain) | |
| 17 K | Other (piedae 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 | Please select |
| | resident in a different jurisdiction to the location | |
| | where bank services are provided) | |
| | 5 Zaim 55. 11555 allo pioriada) | |
| 15 a | If Y, provide the top five countries where the non- | |
| | resident customers are located. | |
| | | |
| | | |
| L | | |
| 16 | Select the closest value: | |
| 16 a | Number of employees | Please select |
| 16 b | Total Assets | Please select |
| 17 | Confirm that all responses provided in the above | 11000000000 |
| ' ' | 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 | |
| 10 | information/context to the answers in this section. | |
| | inionnation/context to the answers in this section. | |
| | | |
| | | |
| 2. PRODU | CTS & SERVICES | |
| | | |
| 10 | Does the Entity offer the following products and | |
| 19 | Does the Entity offer the following products and | |
| | services: | |
| 19 a | services: Correspondent Banking | No |
| | services: Correspondent Banking If Y | No |
| 19 a | services: Correspondent Banking | |
| 19 a 19 a1 | services: Correspondent Banking If Y | No Please select |
| 19 a 19 a1 19 a1a | services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? | |
| 19 a 19 a1 | services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to | |
| 19 a 19 a1 19 a1a 19 a1b | 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? | Please select |
| 19 a 19 a1 19 a1a | 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 | Please select Please select |
| 19 a 19 a1 19 a1a 19 a1b | 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 |
| 19 a 19 a1 19 a1a 19 a1b | 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 | Please select Please select |
| 19 a 19 a1 19 a1a 19 a1b | 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 Please select |
| 19 a 19 a1 19 a1a 19 a1b | 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? | Please select Please select |
| 19 a 19 a1 19 a1a 19 a1b 19 a1c | 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? | Please select Please select Please select |
| 19 a 19 a1 19 a1a 19 a1b | 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 |
| 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d | 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 Please select |
| 19 a 19 a1 19 a1a 19 a1b 19 a1c | 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 | Please select Please select Please select Please select |
| 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d | 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 | Please select Please select Please select Please select |
| 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d | 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 | Please select Please select Please select Please select Please select Please select |
| 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d | 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? | Please select Please select Please select Please select Please select Please select |
| 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d | 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 forer Correspondent Banking | Please select Please select Please select Please select Please select Please select |
| 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d | 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 |
| 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1e | 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 forer Correspondent Banking services to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? | Please select Please select Please select Please select Please select Please select |
| 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d | 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 | Please select Please select Please select Please select Please select Please select |
| 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1e | 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 |
| 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1e | 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 | Please select Please select Please select Please select Please select Please select |
| 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1f 19 a1f | 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 Please select Please select |
| 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1f 19 a1f | 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)? | Please select Please select Please select Please select Please select Please select Please select Please select |
| 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1e 19 a1f | 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 Please select Please select |

| 19 a1i | Does the Entity have processes and procedures | |
|--|---|--|
| | in place to identify downstream relationships with | No |
| | MSBs /MVTSs/PSPs? | NO |
| | WISDS/WIV ISS/FSFS! | |
| 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 | |
| 191 | then offer third party payment services to their customers? | No |
| 19 i1 | If Y , please select all that apply below? | |
| 19 i2 | Third Party Payment Service Providers | M. |
| | | 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 |
| 19 n | Trade Finance | No |
| | | |
| 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 you atota the applicable level of due diligence | |
| is psa | If yes, state the applicable level of due diligence | Please select |
| | | Please select No |
| 19 p4 | Sale of Monetary Instruments | No |
| 19 p4 19 p4a | Sale of Monetary Instruments If yes, state the applicable level of due diligence | |
| 19 p4 | Sale of Monetary Instruments | No |
| 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 | No Please select |
| 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 | No Please select |
| 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 | No Please select Tokyo Branch does not offer any services to walk-in customers. |
| 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 Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to | No Please select Tokyo Branch does not offer any services to walk-in customers. |
| 19 p4 19 p4a 19 p5 19 p5 20 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. | No Please select Tokyo Branch does not offer any services to walk-in customers. |
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| 19 p4 19 p4a 19 p5 19 p5 20 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. | No Please select Tokyo Branch does not offer any services to walk-in customers. |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C1 | 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. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: | No Please select Tokyo Branch does not offer any services to walk-in customers. Please select |
| 19 p4 19 p4a 19 p5 19 p5 20 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. FF & 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 | No Please select Tokyo Branch does not offer any services to walk-in customers. |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C1 | 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. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: | No Please select Tokyo Branch does not offer any services to walk-in customers. Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C7 22 22 a 22 b | 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. FF & 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 | No Please select Tokyo Branch does not offer any services to walk-in customers. Please select Please select Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C1 22 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. FF & 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 | No Please select Tokyo Branch does not offer any services to walk-in customers. Please select Please select Please select Please select Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C7 22 22 a 22 b | 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. FF & 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 | No Please select Tokyo Branch does not offer any services to walk-in customers. Please select Please select Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C1 22 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. FF & 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 | No Please select Tokyo Branch does not offer any services to walk-in customers. Please select Please select Please select Please select Please select |
| 19 p4 19 p4a 19 p5 19 p5 20 20 a 21 3. AML, CT 22 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. FF & 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 | No Please select Tokyo Branch does not offer any services to walk-in customers. Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f | 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. F & 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 | No Please select Tokyo Branch does not offer any services to walk-in customers. Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select |
| 19 p4 19 p4a 19 p5 19 p5 20 20 a 21 3. AML, CT 22 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. FF & 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 | No Please select Tokyo Branch does not offer any services to walk-in customers. Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f | 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. F & 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 | No Please select Tokyo Branch does not offer any services to walk-in customers. Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 c 22 d 22 e 22 f 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. F & 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 | No Please select Tokyo Branch does not offer any services to walk-in customers. 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 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 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. F & 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 | No Please select Tokyo Branch does not offer any services to walk-in customers. Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c 22 d 22 e 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. FF & 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 | No Please select Tokyo Branch does not offer any services to walk-in customers. Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 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. F & 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 | No Please select Tokyo Branch does not offer any services to walk-in customers. Please select |
| 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c 22 d 22 e 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. FF & 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 | No Please select Tokyo Branch does not offer any services to walk-in customers. Please select |

| 22 m | Suspicious Activity Reporting | Please select |
|-----------|---|---------------|
| 22 m | 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? | Please select |
| 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 E | 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 | |
|---|--|---|
| 40 B | Corruption risks associated with the countries and industries in which the Entity does business, directly | Disease select |
|] | or through intermediaries | Please select |
| 40.0 | , and the second | |
| 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 | Please select |
| | increase the Entity's corruption risk | |
| 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 |
| 40.6 | - | |
| 42 f | Non-employed workers as appropriate (contractors/consultants) | Please select |
| 42 | , | |
| 43 | Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities? | Please select |
| 44 | | |
| 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 | |
| 44 a | and the branch/es that this applies to. | |
| | and the branchives that this applies to. | |
| | | |
| 45 | If any and the control of the contro | |
| 45 | If appropriate, provide any additional information/context to the answers in this section. | |
| | iniornation/context to the answers in this section. | |
| | | |
| | | |
| F A MIL OT | E A CANOTIONO DOLLOIDO A DECOCEDURES | |
| | F & SANCTIONS POLICIES & PROCEDURES | |
| 5. AML, CT | Has the Entity documented policies and procedures | |
| | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions | |
| | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, | |
| 46 | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: | |
| 46 46 a | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering | Please select |
| 46 a 46 b | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing | Please select |
| 46 a 46 b 46 c | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations | |
| 46 a 46 b | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at | Please select |
| 46 a 46 b 46 c 47 | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? | Please select Please select |
| 46 a 46 b 46 c | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and | Please select Please select |
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| 46 a 46 b 46 c 47 48 a 48 a 48 a 1 | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? | Please select Please select Please select Please select Please select Please select |
| 46 a 46 b 46 c 47 48 a 48 a 48 a 1 48 b | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards | Please select Please select Please select Please select Please select Please select Please select Please select |
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| 46 a 46 b 46 c 47 48 a 48 a 1 48 b 48 b 1 49 | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? | Please select Please select Please select Please select Please select Please select Please select Please select |
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| 46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d 49 e | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for Section 311 designated entities | 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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| 46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 49 a 49 a 49 b 49 c 49 d 49 e 49 f 49 g | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for Section 311 designated entities | 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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| 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 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. | |
| | | |
| C ANN CTE | FOR CANCETONIC DICK ACCEPCIMENT | |
| 6. AML, CTF | F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: | |
| 54 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: | Diagonal estate |
| 54 54 a | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client | Please select Please select |
| 54 a 54 b | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product | 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 | Please select |
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|------------|--|-----------------------------|
| 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 |
| 50.0 | | |
| 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. If appropriate, provide any additional | |
| | information/context to the answers in this section. | |
| 7. KYC, CI | 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: | i idase select |
| 65 a | Ultimate beneficial ownership | Please select |
| 65 a1 | Are ultimate beneficial owners verified? | No |
| 65 b | Authorised signatories (where applicable) | Please select |
| 65 c | Key controllers | |
| 65 d | Other relevant parties | Please select |
| 66 66 | 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? | No |
| 68 a | If Y, is this at: | |
| 68 a1 | Onboarding | No |
| 68 a2 | KYC renewal | No |
| 68 a3 | Trigger event | No |
| 68 a4 | Other | No |
| 68 a4a | If yes, please specify "Other" | |
| 69 69 a | Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? If Y, is this at: | Please select |
| | | Disease select |
| 69 a1 | Onboarding | Please select |
| 69 a2 | KYC renewal | Please select |

| | T | |
|-------|--|---------------|
| 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 | 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) | |
| 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 u | Unregulated charities | Please select |
| | | |
| 76 w | Used Car Dealers | Please select |
| 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 |

| | Land to the state of the state | |
|-----------|---|---------------|
| 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. MONITO | PRING & 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. PAYMEN | I NT 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 | |
| İ | to ensure compliance with: | |
| 93 a | FATF Recommendation 16 | Disease select |
| | | Please select |
| 93 b | Local Regulations | Please select |
| 93 b1 | If Y, specify the regulation | |
| | | |
| | | |
| | | |
| 93 c | If N, explain | |
| 93 C | II IV, explain | |
| | | |
| | | |
| | | |
| 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 | |
| 33 | of required beneficiary information cross-border | |
| | payment messages? | Please select |
| | | |
| 95 a | If Y, does the Entity have procedures to include | |
| 1 | beneficiary address including country in cross | Please select |
| İ | border payments? | |
| 96 | Confirm that all responses provided in the above | |
| 1 | Section are representative of all the LE's branches | Please select |
| 96 a | • | |
| 30 d | If N, clarify which questions the difference/s relate to | |
| İ | 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 | 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 | 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 | 1 lease select |
| İ | and/or masking, of sanctions relevant information in | |
| 1 | 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 |
| İ | against Sanctions Lists? | |
| 400 | | |
| 102 | What is the method used by the Entity for sanctions | Please select |
| | screening? | 1100000000 |
| 102 a | If 'automated' or 'both automated and manual' | |
| İ | 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) | |
| 103 | Does the Entity screen all sanctions relevant data, | |
| 103 | 1 | |
| | including at a minimum, entity and location | Please select |
| | information, contained in cross border transactions | |
| | against Sanctions Lists? | |
| 104 | What is the method used by the Entity? | Please select |
| 104 | | |

| 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 | Disconnelled |
| | Sanctions List (UN) | Please select |
| 106 b | United States Department of the Treasury's Office of | Plance colort |
| | Foreign Assets Control (OFAC) | Please select |
| 106 с | Office of Financial Sanctions Implementation HMT | Please select |
| | (OFSI) | Fledse 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 | Please select |
| | comprehensive jurisdiction-based Sanctions? | |
| 109 | Confirm that all responses provided in the above | |
| 1.00 | 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. TRAININ | G & EDUCATION | |
| 11. TRAININ | Does the Entity provide mandatory training, which | |
| 111 | Does the Entity provide mandatory training, which includes: | |
| | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to | Please select |
| 111 111 a | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities | Please select |
| 111 | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, | Please select |
| 111 111 a | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant | |
| 111 111 a | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, | Please select Please select |
| 111 a 111 b | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered | |
| 111 111 a | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, | |
| 111 a 111 b 111 c | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations | Please select |
| 111 a 111 b | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant | Please select |
| 111 a 111 b 111 c 111 d | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations | Please select Please select Please select |
| 111 a 111 b 111 c 111 d 111 e | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant | Please select Please select Please select Please select |
| 111 a 111 a 111 b 111 c 111 d 111 e 111 f | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud | Please select Please select Please select |
| 111 a 111 b 111 c 111 d 111 e | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: | Please select Please select Please select Please select Please select |
| 111 a 111 a 111 b 111 c 111 d 111 e 111 f 112 | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud | Please select Please select Please select Please select |
| 111 a 111 a 111 b 111 c 111 d 111 e 111 f 112 | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management | Please select Please select Please select Please select Please select Please select |
| 111 a 111 a 111 b 111 c 111 d 111 e 111 f 112 112 a 112 b | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence | Please select Please select Please select Please select Please select Please select Please select |
| 111 a 111 a 111 b 111 c 111 d 111 e 111 f 112 112 a 112 b 112 c | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture 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 Please select Please select Please select Please select Please select Please select Please select Please select |
| 111 a 111 a 111 b 111 c 111 d 111 e 111 f 112 112 a 112 b 112 c 112 d | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture 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 | Please select Please select Please select Please select Please select Please select Please select Please select Please select |
| 111 a 111 a 111 b 111 c 111 d 111 e 111 f 112 112 a 112 b 112 c 112 d | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture 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 Please select Please select Please select Please select Please select |
| 111 a 111 b 111 c 111 c 111 f 112 a 112 c 112 d 112 e 112 e | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture 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 | Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select Please select |
| 111 a 111 b 111 c 111 c 111 d 111 e 111 f 112 a 112 b 1112 d 112 c 112 d 112 e 112 f | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture 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 Please select Please select Please select Please select |
| 111 a 111 b 111 c 111 d 111 e 111 f 112 a 112 b 112 c 112 d 112 e 112 f 113 | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture 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? | 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 |
| 111 a 111 b 111 c 111 c 111 d 111 e 111 f 112 a 112 b 1112 d 112 c 112 d 112 e 112 f | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture 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 Please select Please select Please select Please select Please select |
| 111 a 111 a 111 b 111 c 111 d 111 e 111 f 112 a 112 b 112 c 112 d 112 e 112 f 113 | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture 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, CTF and Sanctions staff? | 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 |
| 111 111 a 111 b 111 c 111 c 111 d 111 e 111 f 112 a 112 b 112 c 112 d 112 c 112 d 113 114 114 a 114 a | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd 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, CTF and Sanctions staff? If Y, how frequently is training delivered? | 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 |
| 111 a 111 a 111 b 111 c 111 d 111 e 111 f 112 a 112 b 112 c 112 d 112 e 112 f 113 | Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture 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, CTF and Sanctions staff? | 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 |

| 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. | |
| | | |
| | 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 | Please select |
| 123 a | third party cover the following areas: | |
| | AML, CTF, ABC, Fraud and Sanctions policy and procedures | Please select |
| 123 b 123 c | Enterprise Wide Risk Assessment Governance | Please select 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 Transaction Screening including for sanctions | Please select |
| 123 j 123 k | Training & Education | Please select Please select |
| 123 I | Other (specify) | Ticase 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 | | <u> </u> |
| 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. | |
| Declara | tion Statement | I |
| <u>Declara</u> | tion Statement | |
| Declaration | Group Correspondent Banking Due Diligence Questionnaire 2023 (CBI n Statement (To be signed by Global Head of Correspondent Bank by Laundering, Chief Compliance Officer, Global Head of Financial | ing or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head o |

BBVA, Tokyo 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 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 Akihiro Kato (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) 21 Dec. 2023 _ (Signature & Date)