

Financial Institution Name: Location (Country) :

9 - Basellandschaftliche Kantonalbank Rheinstrasse 7, CH-4410 Liestal, Switzerland

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, 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 #	erially different than its Entity Head Office, a separate questionnaire can Question	Answer
_	& OWNERSHIP	AHOWEI
1	Full Legal Name	
'	ruii Legai Name	
		BASELLANDSCHAFTLICHE KANTONALBANK
2	Append a list of foreign branches which are covered by	
2	this questionnaire	
	and quoditionand	N/A
3	Full Legal (Registered) Address	
3	Tuli Legal (Negistered) Address	
		Rheinstrasse 7, CH-4410 Liestal, Switzerland
4	Full Primary Business Address (if different from above)	
•	Tail Timary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	
· ·	Date of Entity moorporation postabliormion	
		January 23, 1883
6	Select type of ownership and append an ownership chart	
-	if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	Yes
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
	Door the Cetite and a fite beautiful and a second	
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	no.
	services only through online channels?	no
10	Name of primary financial regulator/supervisory authority	
		Swiss Financial Market Supervisory Authority FINMA, Bern, Switzerland
		Sand Superiory Flamony Flamon, Serin, Officendia
11	Provide Legal Entity Identifier (LEI) if available	
		529900TPRILCY8WVKI23
10	Describe the full level	
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	
	umerent nom the Entity completing the DDQ)	N/A
10	Individual of Branch and Art Co. Co. Co.	
13	Jurisdiction of licensing authority and regulator of ultimate	
	parent	N/A
	01.44.1	
14	Select the business areas applicable to the Entity	Von
14 a	Retail Banking Private Banking	Yes
14 b	r iivale Dalikiliy	Yes

14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	No
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	Cutor (podde expan)	
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	No
15 a	brovided)  If Y, provide the top five countries where the non- resident customers are located.	
	Coloret the release to the lease	
16	Select the closest value:	
16 a	Number of employees	501-1000
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.	Yes
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 DDODII	CTS & SERVICES	
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	Yes
19 a1	lf Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	Yes
19 a1b	Does the Entity allow domestic bank clients to	No
40 -4	provide downstream relationships?	
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Yes
19 a1e	Does the Entity allow downstream relationships with foreign banks?	No
19 a1f	Does the Entity have processes and procedures in	
19 211	place to identify downstream relationships with foreign banks?	Yes
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

19 a1i	Does the Entity have processes and procedures in	
	place to identify downstream relationships with	No
	MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	Yes
19 e	Hold Mail	Yes
19 f	International Cash Letter	No I
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.
		140
19 i1	If Y, please select all that apply below?	
		N.
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 15	Otrier - Please explain	
19 j	Private Banking	International/Cross border
19 k	Remote Deposit Capture (RDC)	No .
19 I	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	Yes
	Trade Finance	No
19 n		
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
	Wile dalisiers	110
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	Yes
10 -2-		
19 038	If ves. state the applicable level of due diligence	IDue Diligence
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	No
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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.	No
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19 p4 19 p4a 19 p5 19 q 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.  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	Conversion of recalled CHF banknotes below threshold CHF 15'000 with Due Diligence  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y
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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 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  Independent Testing  Periodic Review	Conversion of recalled CHF banknotes below threshold CHF 15'000 with Due Diligence  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y
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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 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  Independent Testing  Periodic Review	Conversion of recalled CHF banknotes below threshold CHF 15'000 with Due Diligence  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y
19 p4 19 p4 19 p4a 19 p5  19 q  20 20 a  21  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	Conversion of recalled CHF banknotes below threshold CHF 15'000 with Due Diligence  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y
19 p4 19 p4a 19 p5 19 q 20 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 i	Sale of Monetary Instruments  If yes, state the applicable level of due diligence  If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  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	Conversion of recalled CHF banknotes below threshold CHF 15'000 with Due Diligence  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y

		No.
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,	1-10
	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	Yes
	Management Committee? If N, describe your practice in	100
	Question 29.	
25	Does the Board receive, assess, and challenge regular	
	reporting on the status of the AML, CTF, & Sanctions	Yes
	programme?	
26	Does the Entity use third parties to carry out any	l.,
	components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	
20 a	ii i, provide fartifer detaile	
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	165
28 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
	If appropriate provide and distance of the control	
29	If appropriate, provide any additional information/context	
	to the answers in this section.	
4 ANTIR	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
30	consistent with applicable ABC regulations and	
	requirements to reasonably prevent, detect and report	Yes
	bribery and corruption?	
31	Does the Entity have an enterprise wide programme that	
31	sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers	
32	with sufficient experience/expertise responsible for	Yes
	coordinating the ABC programme?	163
33	Does the Entity have adequate staff with appropriate	
55	levels of experience/expertise to implement the ABC	Yes
		100
34	programme?	
34	programme?  Is the Entity's ABC programme applicable to:	Not Applicable
35	programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that:	
	programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This	
35	programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or	Not Applicable
35	programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	
35	programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an	Not Applicable
35 35 a	programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Not Applicable  Yes
35	programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction	Not Applicable
35 35 a	programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantace  Includes enhanced requirements regarding interaction with public officials?	Not Applicable  Yes
35 35 a	programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books	Not Applicable  Yes
35 35 a	programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any	Not Applicable  Yes
35 35 a	programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books	Not Applicable  Yes  Yes
35 35 a	programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.  Includes enhanced requirements regarding interaction with public officials?  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)?	Not Applicable  Yes  Yes
35 35 a	programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage includes enhanced requirements regarding interaction with public officials?  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)?  Does the Entity have controls in place to monitor the	Not Applicable  Yes  Yes  Yes
35 35 a 35 b 35 c 36	programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage includes enhanced requirements regarding interaction with public officials?  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)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Not Applicable  Yes  Yes
35 a 35 b 35 c	programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  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)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular	Not Applicable  Yes  Yes  Yes  Yes
35 35 a 35 b 35 c 36	programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  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)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Not Applicable  Yes  Yes  Yes
35 35 a 35 b 35 c 36	programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  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)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular	Not Applicable  Yes  Yes  Yes  Yes
35 a 35 b 35 c 36 37	programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  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)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Not Applicable  Yes  Yes  Yes  Yes
35 a 35 b 35 c 36 37	programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.  Includes enhanced requirements regarding interaction with public officials?  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)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment	Not Applicable  Yes  Yes  Yes  Yes  Yes
35 35 a 35 b 35 c 36 37 38	programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantace  Includes enhanced requirements regarding interaction with public officials?  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)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Not Applicable  Yes  Yes  Yes  Yes  Yes
35 a 35 b 35 c 36 37	programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  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)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Not Applicable  Yes  Yes  Yes  Yes  Yes
35 35 a 35 b 35 c 36 37 38	programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantace  Includes enhanced requirements regarding interaction with public officials?  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)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Not Applicable  Yes  Yes  Yes  Yes  Yes
35 35 a 35 b 35 c 36 37 38	programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  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)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Not Applicable  Yes  Yes  Yes  Yes  Yes
35 35 a  35 b  35 c  36 37 38 38 a	Is the Entity's ABC programme applicable to:   Does the Entity have a global ABC policy that:   Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage   Includes enhanced requirements regarding interaction with public officials?   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)?	Not Applicable  Yes  Yes  Yes  Yes  Yes
35 35 a 35 b 35 c 36 37 38	Is the Entity's ABC programme applicable to:   Does the Entity have a global ABC policy that:   Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage   Includes enhanced requirements regarding interaction with public officials?   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)?	Not Applicable  Yes  Yes  Yes  Yes  Yes  Yes
35 35 a  35 b  35 c  36 37 38 38 a	Is the Entity's ABC programme applicable to:   Does the Entity have a global ABC policy that:   Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage   Includes enhanced requirements regarding interaction with public officials?   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)?    Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Not Applicable  Yes  Yes  Yes  Yes  Yes
35 35 a 35 b 35 c 36 37 38 38 a 39	Is the Entity's ABC programme applicable to:   Does the Entity have a global ABC policy that:   Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage   Includes enhanced requirements regarding interaction with public officials?   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)?    Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Not Applicable  Yes  Yes  Yes  Yes  Yes  Yes
35 35 a  35 b  35 c  36 37 38 38 a	programme?	Not Applicable  Yes  Yes  Yes  Yes  Yes  Yes
35 35 a 35 b 35 c 36 37 38 38 a 39 40	programme?   Is the Entity's ABC programme applicable to:   Does the Entity have a global ABC policy that:   Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantace   Includes enhanced requirements regarding interaction with public officials?   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)?	Not Applicable  Yes  Yes  Yes  Yes  Yes  Yes
35 35 a 35 b 35 c 36 37 38 38 a 39	programme?	Not Applicable  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y
35 35 a 35 b 35 c 36 37 38 38 a 39 40 40 a	Is the Entity's ABC programme applicable to:   Does the Entity have a global ABC policy that:   Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage   Includes enhanced requirements regarding interaction with public officials?   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)?	Not Applicable  Yes  Yes  Yes  Yes  Yes  Yes
35 35 a 35 b 35 c 36 37 38 38 a 39 40	Is the Entity's ABC programme applicable to:   Does the Entity have a global ABC policy that:   Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage   Includes enhanced requirements regarding interaction with public officials?   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)?	Not Applicable  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y
35 35 a 35 b 35 c 36 37 38 38 a 39 40 40 a	Is the Entity's ABC programme applicable to:   Does the Entity have a global ABC policy that:   Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage   Includes enhanced requirements regarding interaction with public officials?   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)?	Not Applicable  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y
35 35 a 35 b 35 c 36 37 38 38 a 40 40 a 40 b	Is the Entity's ABC programme applicable to:   Does the Entity have a global ABC policy that:   Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage   Includes enhanced requirements regarding interaction with public officials?   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)?    Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Not Applicable  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y
35 35 a 35 b 35 c 36 37 38 38 a 39 40 40 a	Is the Entity's ABC programme applicable to:   Does the Entity have a global ABC policy that:   Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage   Includes enhanced requirements regarding interaction with public officials?   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)?	Not Applicable  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y
35 35 a 35 b 35 c 36 37 38 38 a 40 40 a 40 b	Is the Entity's ABC programme applicable to:   Does the Entity have a global ABC policy that:   Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantace   Includes enhanced requirements regarding interaction with public officials?   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)?	Not Applicable  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y
35 35 a 35 b 35 c 36 37 38 38 a 40 40 a 40 b	Is the Entity's ABC programme applicable to:   Does the Entity have a global ABC policy that:   Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage   Includes enhanced requirements regarding interaction with public officials?   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)?	Not Applicable  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y
35 35 a 35 b 35 c 36 37 38 38 a 40 40 a 40 b	Is the Entity's ABC programme applicable to:   Does the Entity have a global ABC policy that:   Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage   Includes enhanced requirements regarding interaction with public officials?   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)?    Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Not Applicable  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y
35 35 a 35 b 35 c 36 37 38 38 a 40 40 a 40 b	Is the Entity's ABC programme applicable to:   Does the Entity have a global ABC policy that:   Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage   Includes enhanced requirements regarding interaction with public officials?   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)?	Not Applicable  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y
35 35 a 35 b 35 c 36 37 38 38 a 39 40 40 b 40 c	Is the Entity's ABC programme applicable to:   Does the Entity have a global ABC policy that:   Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage   Includes enhanced requirements regarding interaction with public officials?   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)?    Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Not Applicable  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y

40 e	Changes in business activities that may materially	
40 e	increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 C	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	No 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?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
5. AML, C	CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent,	
46 a	detect and report:  Money laundering	Yes
46 b	Terrorist financing	Yes
46 C	Sanctions violations	Yes
47 47	Are the Entity's policies and procedures updated at least	
48	annually?  Has the Entity chosen to compare its policies and	Yes
40	procedures against:	
48 a	U.S. Standards	No
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	No
48 b1	If Y, does the Entity retain a record of the results?	
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	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	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes

49 i	Define the process for escalating financial crime risk	
431	issues/potentially suspicious activity identified by	Yes
		Tes
	employees	
49 j	Define the process, where appropriate, for terminating	
•	existing customer relationships due to financial crime	Yes
40.1	risk	
49 k	Define the process for exiting clients for financial	
	crime reasons that applies across the entity, including	Yes
	foreign branches and affiliates	
49 I	Define the process and controls to identify and handle	
431		
	customers that were previously exited for financial	Yes
	crime reasons if they seek to re-establish a	
	relationship	
49 m	Outline the processes regarding screening for	
	sanctions, PEPs and Adverse Media/Negative News	Yes
	Salictions, FEFS and Adverse Media/Negative News	
49 n	Outline the processes for the maintenance of internal	
	"watchlists"	Yes
50		
50	Has the Entity defined a risk tolerance statement or	L.
	similar document which defines a risk boundary around	Yes
	their business?	
51	Does the Entity have record retention procedures that	
		Yes
<u></u>	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	Yes
F0 -		
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.	
	to the answers in this section.	
6. AML, CT	F & SANCTIONS RISK ASSESSMENT	
6. AML, CT		
	Does the Entity's AML & CTF EWRA cover the inherent	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Yes
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client	Yes
54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product	Yes
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel	Yes Yes
54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography	Yes
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography	Yes Yes
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 controls	Yes Yes
54 a 54 b 54 c 54 d 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes Yes Yes
54 a 54 b 54 c 54 d 55 55 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes Yes Yes Yes Yes
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	Yes Yes Yes
54 a 54 b 54 c 54 d 55 55 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 d 55 a 55 b 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	Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative	Yes
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	Yes
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	Yes
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 Training and Education	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 e 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	Yes
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	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 e 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	Yes
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	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in	Yes
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?	Yes
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	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	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
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	Yes
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	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 d 55 c 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.	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 d 55 c 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.	Yes
54 a 54 b 54 c 54 d 55 b 55 a 55 b 55 c 55 d 55 b 55 f 55 g 55 h 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:	Yes
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 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	Yes         Yes
54 a 54 a 54 b 54 c 54 d 55 a 55 b 55 c 55 d 55 c 55 d 55 6 55 f 55 g 55 h 56 a 57 b 57 a 57 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g 55 f 56 a 57 a 57 b 57 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes         Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g 55 f 56 a 57 a 57 b 57 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
54 a 54 b 54 c 54 d 55 5 5 a 55 b 55 c 55 d 55 b 55 f 55 g 55 h 56 a 57 a 57 a 57 a 57 d 57 d 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 Geography	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g 55 f 56 a 57 a 57 b 57 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 b 55 c 55 f 55 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 PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
54 a 54 b 54 c 54 d 55 5 a 55 b 55 c 55 d 55 b 55 f 55 a 55 h 56 a 57 a 57 a 57 c 57 d 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 Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 555 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a  57 a 57 a 57 c 57 d 58 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
54 a 54 b 54 c 54 d 55 5 a 55 b 55 c 55 d 55 c 55 d 55 h 56 a 57 a 57 a 57 a 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	Yes
54 a 54 a 54 b 54 c 54 d 55 5 a 55 b 55 c 55 d 55 b 55 c 55 d 55 6 55 f 55 d 55 h 56 a 57 a 57 b 57 c 57 d 58 a 58 b 58 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance List Management	Yes
54 a 54 a 54 b 54 c 54 d 55 5 5 a 55 5 d 55 6 55 d 55 6 56 a 57 a 57 a 57 c 57 d 58 a 58 b 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	Yes

58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the	Yes
	last 12 months?	165
59 a	If N, provide the date when the last Sanctions EWRA	
	was completed.	
	O - of the state o	
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	
00 a	and the branch/es that this applies to.	
	and the branchives that this applies to.	
61	If appropriate, provide any additional information/context	
	to the answers in this section.	
7 1//0 05	D and EDD	
	DD and EDD	V
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	Von
	CDD must be completed, e.g. at the time of onboarding	Yes
64	or within 30 days? Which of the following does the Entity gather and retain	
64	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
	Product usage	Yes
64 e	Purpose and nature of relationship	
64 f	Source of funds	Yes
64 g	Source of runds Source of wealth	Yes
64 h		Yes
65	Are each of the following identified:	W.
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes No
65 b	Authorised signatories (where applicable)	
65 c	Key controllers	Yes
65 d	Other relevant parties	No
66	What is the Entity's minimum (lowest) threshold applied to	0%
67	beneficial ownership identification?  Does the due diligence process result in customers	
67	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
67 a6	Other (specify)	
01 40	Guior (opeany)	
		PEP Status; Transactions with high-risk countries; AuA; Turnover; Domiciliary Status; Industry Sector
68	For high risk non-individual customers, is a site visit a part	Yes
	of your KYC process?	
68 a	If Y, is this at:	M.
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4	Other	No
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening	
	customers for Adverse Media/Negative News?	Yes
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

	T	lv.
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	Yes
	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	v.
	customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
	they are FEFS, or controlled by FEFS?	
74	Is KYC renewed at defined frequencies based on risk	Yes
	rating (Periodic Reviews)?	165
74 a	If yes, select all that apply:	M
74 a1 74 a2	Less than one year	No Yes
74 a2 74 a3	1 – 2 years 3 – 4 years	Yes
74 a3	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
		Fraguespica are based on 5 right entergrice
		Frequencies are based on 5 risk categories
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	
70	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	EDD on risk-based approach
76 b1	If EDD or restricted, does the EDD assessment	
	contain the elements as set out in the Wolfsberg	Yes
70 -	Correspondent Banking Principles 2022? Embassies/Consulates	Prohibited
76 c 76 d	Extractive industries	Do not have this category of customer or industry
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	Prohibited
76 i	Non-account customers	Do not have this category of customer or industry
76 j	Non-Government Organisations Non-resident customers	EDD on risk-based approach Prohibited
76 k 76 l	Non-resident customers  Nuclear power	Do not have this category of customer or industry
76 m	Payment Service Providers	Prohibited
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
<u>76 q</u>	Precious metals and stones	Do not have this category of customer or industry
76 r	Red light businesses/Adult entertainment Regulated charities	Prohibited EDD on risk-based approach
76 s 76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v	Unregulated charities	EDD on risk-based approach
76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers	Do not have this category of customer or industry
76 y	Other (specify)	
	W at a large control	
77	If restricted, provide details of the restriction	
		Strategy Match Assessment under aspects of values, ethics and sustainability
		<u>.</u> ,
70	Door EDD require conject husiness management	
78	Does EDD require senior business management and/or compliance approval?	Yes

Serior business management	Pos the Entity have specific procedures for onboarding ontities that handle client money such as lawyers, accountants, consultants, real estities agents?  80 Does the Entity perform an additional control or quality 81 Confirm that all responses provised in the above Section are representative at all the LEs branches are representative at all the LEs branches are representative at all the Est branches are representative at all the Septies to a set of the beneficial to the sophies to a set of the beneficial to the sophies to the services that the species to the services and monitoring processes for the definitions and reporting or processes for the definition and reporting or processes for the definition of the definition of automated and manual transactions are monotored manually because the definition of automated and manual transactions are monotored manually because the definition of automated and manual transactions are monotored manually because the definition of automated and manual transactions are monotored manually because the definition of automated and manual transactions are monotored manually because the definition of automated and manual transactions are monotored manually because the definition of automated and manual transactions are monotored manually because the definition of automated and manual transa	79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers,	
entities that handle client money such as lawyers, accountants, consultants, consultants, call estate appears?  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 and the branchies that this applies to and the branchies that this applies to the answers in this section.  82 If appropriate, provide any additional information/context to the answers in this section.  83 Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?  84 What is the merhod used by the Entity to monitor transactions activities?  84 If automated or combination selected, are internal system or vendor-sourced tools used;  85 If automated or combination selected, are internal system or vendor-sourced tools used;  86 If automated or combination selected, are internal system or vendor-sourced tools used;  86 If a vendor-sourced tools used;  87 When was the tool last updated?  88 If When was the tool last updated?  89 Does the Entity have a data quality management programment or expective projections, procedures and processes to neview and escalate matters arising from the monitoring of customer transactions (Fibr) from the monitoring of customer transactions and activity?  80 Does the Entity have a data quality management programment to ensure that complete detail for all transactions are information (Fibr) for the incustomer is a timely manner?  80 Does the Entity have processes in piece to man the properties, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?  81 Exprepriate, provide any additional information/context to a strend processes to review and escalate matters arising from the monitoring of customer transactions and entities.  8	oritises that handed cleint money such as lawyers, accountants, consultants, real estata agents?  80 Does the Entity perform an additional control or quality teleview on diesta subsets to EOD?  81 a If N. Cusfry which quotises the difference's relate to and the branchies that this applies to all the LE's branches  81 a If N. Cusfry which quotises the difference's relate to and the branchies that this applies to and the branchies that this applies to and the branchies that this applies to the relative to the things of things of the things of things of the things of things of the things of the things of the things of the things of things of the things of the things of the things of the things of		entities that handle client money such as lawyers,	V
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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	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.			Yes
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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	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.	90		Yes
and the branch/es that this applies to  91 If appropriate, provide any additional information/context	and the branch/es that this applies to  91	90 a		
91 If appropriate, provide any additional information/context	91 If appropriate, provide any additional information/context to the answers in this section.			
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	to the answers in this section.	91	If appropriate, provide any additional information/context	
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Does the Entity adhere to the Welfsherg Group Payment	AZ IDOGO NE ENNY GUNER NO NE WONSOEN CHOUD FAVINENT I		NT TRANSPARENCY	
Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?  Yes			Does the Entity adhere to the Wolfsberg Group Payment	Yes
92 Does the Entity adhere to the Wolfsberg Group Payment Ves	1			Ves

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 b If Y, specify the regulation  Federal AML Ordinance and FINMA AML Ordinance	
compliance with:  93 a FATF Recommendation 16 Yes  93 b Local Regulations Yes  93 b If Y, specify the regulation  Federal AML Ordinance and FINMA AML Ordinance	
93 a FATF Recommendation 16 Yes 93 b Local Regulations Yes 93 b1 If Y, specify the regulation Federal AML Ordinance and FINMA AML Ordinance	
93 b Local Regulations Yes 93 b1 If Y, specify the regulation Federal AML Ordinance and FINMA AML Ordinance	
93 b1 If Y, specify the regulation Federal AML Ordinance and FINMA AML Ordinance	
Federal AML Ordinance and FINMA AML Ordinance	
93 c If N, explain	
93 c If N, explain	
93 c If N, explain	
94 Does the Entity have controls to support the inclusion of	
required and accurate originator information in cross Yes	
border payment messages?	
95 Does the Entity have controls to support the inclusion of	
required beneficiary information cross-border payment Yes	
messages?	
95 a If Y, does the Entity have procedures to include	
beneficiary address including country in cross border  Yes	
payments?	
OC Confirm that all reaponage 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.	
to the distribution in this decision.	
10. SANCTIONS	
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  Yes	
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 Yes	
to the other entity (including prohibitions within the other	
entity's local jurisdiction)?	
100 Does the Entity have policies, procedures or other	
Loots the Entity have pointies, procedures of 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	
Such as stripping, or the resubmission and/or masking, or	
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	
ILISIS!	
Lists?  What is the method used by the Entity for sanctions	
102 What is the method used by the Entity for sanctions	
What is the method used by the Entity for sanctions screening?  Both Automated and Manual	
What is the method used by the Entity for sanctions screening?  Both Automated and Manual  If 'automated' or 'both automated and manual'	
102 What is the method used by the Entity for sanctions screening?  102 a If 'automated' or 'both automated and manual' selected:	
What is the method used by the Entity for sanctions screening?   Both Automated and Manual	
What is the method used by the Entity for sanctions screening?   Both Automated and Manual	
What is the method used by the Entity for sanctions screening?   Both Automated and Manual	
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What is the method used by the Entity for sanctions screening?   Both Automated and Manual	
What is the method used by the Entity for sanctions screening?  Both Automated and Manual  If 'automated' or 'both automated and manual' selected:  102 a1 Are internal system of vendor-sourced tools used? Vendor-sourced tools  If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?  Finastra Compliance Filter  When did you last test the effectiveness (of finding true matches) and completeness (lock of missing true matches)	
What is the method used by the Entity for sanctions screening?   Both Automated and Manual	
What is the method used by the Entity for sanctions screening?   Both Automated and Manual	
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What is the method used by the Entity for sanctions screening?   Both Automated and Manual	
What is the method used by the Entity for sanctions screening?  102 a	
What is the method used by the Entity for sanctions screening?   Both Automated and Manual	
What is the method used by the Entity for sanctions screening?   Both Automated and Manual	
What is the method used by the Entity for sanctions screening?   Both Automated and Manual	
What is the method used by the Entity for sanctions screening?   Both Automated and Manual	
What is the method used by the Entity for sanctions screening?   Both Automated and Manual	
What is the method used by the Entity for sanctions screening?   Both Automated and Manual	ng transactional data
What is the method used by the Entity for sanctions screening?   Both Automated and Manual	
What is the method used by the Entity for sanctions screening?   Both Automated and Manual	
What is the method used by the Entity for sanctions screening?	ng transactional data
What is the method used by the Entity for sanctions screening?	ng transactional data

106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	Lists maintained by other G7 member countries	Not used
106 e	Other (specify)	INOLUSEU
	., "	SECO (Switzerland), Bern 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	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	
	NG & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to :	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	No
112 f	Non-employed workers (contractors/consultants)	No
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above 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	
110	to the answers in this section.	
	Y ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from	Von
	the independent Audit function)?	165
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	Yes
	are representative of all the LE's branches	Tes
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	and the branewes that this applies to.	
120	If appropriate, provide any additional information/context	
	to the answers in this section.	
12 ALIDIT		
13. AUDIT	In addition to inspections by the government	
121	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,	
100	Fraud and Sanctions programme by the following:	VI.
122 a 122 b	Internal Audit Department External Third Party	Yearly Yearly
123	Does the internal audit function or other independent third	Toury
	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 123 e	KYC/CDD/EDD and underlying methodologies  Name Screening & List Management	Yes Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology Transaction Manitoring	Yes
123 i 123 j	Transaction Monitoring Transaction Screening including for sanctions	Yes Yes
123 k	Training & Education	Yes
123 I	Other (specify)	
124	Are adverse findings from internal & external audit	
12-7	tracked to completion and assessed for adequacy and	Yes
405	completeness?	
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
100	If appropriate provide annual distance of the second	
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	Yes
128	risk?  Does the Entity have a dedicated team responsible for	
120	preventing & detecting fraud?	Yes

Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?  Confirm that all responses provided in the above section	Yes
Confirm that all responses provided in the above section	
are representative of all the LE's branches	Yes
If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
f appropriate, provide any additional information/context o the answers in this section.	
Declaration Statement	
•	and the branch/es that this applies to.  appropriate, provide any additional information/context the answers in this section.

(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

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

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

Basellandschaftliche Kantonalbank

I, \_Hava Masyan\_\_\_\_ (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, Patrick Keck (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.

Liestal, 22/03/2024 Hava Masyan \_\_\_\_\_ (Signature & Date) Liestal, 22/03/2024 Patrick Keck (Signature & Date)