

Financial Institution Name:	Sudameris Bank SAECA
Location (Country) :	Paraguay

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
	TY & OWNERSHIP	
1	Full Legal Name	
_		Sudameris Bank SAECA
2	Append a list of foreign branches which are covered by this questionnaire	All lead brooks
3	Full Legal (Registered) Address	All local branches
		Independencia Nacional 513 Asunción, Paraguay
4	Full Primary Business Address (if different from above)	N/A
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)	No
6 a1	If Y, indicate the exchange traded on and ticker symbol	N/A
6 b	Member Owned/ Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	UBO: Mr Conor Mc Enroy 78,11%; Nederlandse Financierings-Maatschappij voor Ontwikkelingslanden N.V.(FMO) 15%
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	N/A
9	Name of primary financial regulator / supervisory authority	Banco Central del Paraguay

	Is an a second con-	
10	Provide Legal Entity Identifier (LEI) if available	
		2549006DVXEOF1JIKY44
11	Provide the full legal name of the ultimate parent	
	(if different from the Entity completing the DDQ)	N/A
12	Jurisdiction of licensing authority and regulator	
	of ultimate parent	N/A
13	Select the business areas applicable to the	
13 a	Entity Retail Banking	
13 a	Retail Banking	Yes
13 b	Private Banking / Wealth Management	
13 c	Commercial Banking	No .
13 0	Commercial Banking	Yes
13 d	Transactional Banking	
13 e	Investment Banking	Yes
		No
13 f	Financial Markets Trading	
13 g	Securities Services / Custody	No
	ŕ	No
13 h	Broker / Dealer	No.
13 i	Multilateral Development Bank	No Control of the Con
		No
13 j	Other	
		No
14	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it	
	derive more than 10% of its revenue from non-	
	resident customers? (Non-resident means	
	customers primarily resident in a different jurisdiction to the location where bank services	
	are provided.)	No
14 a	If Y, provide the top five countries where the non- resident customers are located.	
		N/A
15	Select the closest value:	
15 a	Number of employees	201.500
45.1	Total Assets	201-500
15 b	Total Assets	Greater than \$500 million
16	Confirm that all responses provided in the	
	above Section ENTITY & OWNERSHIP are representative of all the LE's branches	Yes
16 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to.	N/A
		IWA
16 b	If appropriate, provide any additional information	
100	/ context to the answers in this section.	
		N/A

2. PROD	DUCTS & SERVICES	
17	Does the Entity offer the following products and	
	services:	
17 a	Correspondent Banking	No
17 a1	If Y	N/A
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?	
17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?	
17 a4	Does the Entity have processes and procedures in place to identify downstream relationships	
17 a5	with domestic banks?  Does the Entity offer correspondent banking	
	services to Foreign Banks?	
	Does the Entity allow downstream relationships with Foreign Banks?	
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?	
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?	
17 b	Private Banking (domestic & international)	No
17 с	Trade Finance	Yes
17 d	Payable Through Accounts	No
17 e	Stored Value Instruments	No
17 f	Cross Border Bulk Cash Delivery	No
17 g	Domestic Bulk Cash Delivery	No
17 h	International Cash Letter	Yes
17 i	Remote Deposit Capture	No
17 j	Virtual /Digital Currencies	No No
17 k	Low Price Securities	
17 I	Hold Mail	No
17 m	Cross Border Remittances	No
17 n	Service to walk-in customers (non-account	Yes
17 o	holders) Sponsoring Private ATMs	Yes
17 p	Other high risk products and services identified by the Entity	No .
		No, the Bank does not provide any additional high risk products.
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	Yes
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18 b	If appropriate, provide any additional information / context to the answers in this section.	N/A
		N/A

3. AML	, CTF & SANCTIONS PROGRAMME	
-	,	
19	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards	
	regarding the following components:	
19 a	Appointed Officer with sufficient	
19 a	experience/expertise	Van
19 b	Cash Reporting	Yes
เฮเม	Cash Reporting	Not Applicable
19 c	CDD	Not Applicable
19 6	CDD	Van
19 d	EDD	Yes
19 0	EDD	W
19 e	Beneficial Ownership	Yes
13 6	Deficicial Ownership	Van
19 f	Independent Testing	Yes
191	independent resuing	NI <sub>0</sub>
19 g	Periodic Review	No .
13 g	T chodic review	Yes
19 h	Policies and Procedures	1100
	. S.I.S.S dila i roccarios	Yes
19 i	Risk Assessment	1100
		Yes
19 j	Sanctions	1100
,		Yes
19 k	PEP Screening	163
15 K	1 Et coronning	Yes
19 I	Adverse Information Screening	165
	g	Yes
19 m	Suspicious Activity Reporting	100
	Caspioleas / isarriy / reperiming	Yes
19 n	Training and Education	
		Yes
19 o	Transaction Monitoring	
		Yes
20	How many full time employees are in the Entity's	
	AML, CTF & Sanctions Compliance	10-50
	Department?	
21	Is the Entity's AML, CTF & Sanctions policy	
	approved at least annually by the Board or	Yes
	equivalent Senior Management Committee?	
22	Does the Board or equivalent Senior	
	Management Committee receive regular	Monthly
	reporting on the status of the AML, CTF &	
22	Sanctions programme?	
23	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions	NI <sub>2</sub>
	programme?	No
23 a	If Y, provide further details	
∠3 a	ii i, provide futitier detalls	
		N/A
0.4	Confirm that all respondence are side discul-	
24	Confirm that all responses provided in the	
	above Section AML, CTF & SANCTIONS Programme are representative of all the LE's	Yes
	branches	
24 a	If N, clarify which questions the difference/s	
27 a	relate to and the branch/es that this applies to.	
	The state of the state of the the applies to.	N/A
24 h	If appropriate provide any additional information	
24 b	If appropriate, provide any additional information / context to the answers in this section.	
	, context to the answers in this section.	N/A
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25	Has the Entity documented policies and	
	procedures consistent with applicable ABC	Van
	regulations and requirements to [reasonably]	Yes
	prevent, detect and report bribery and corruption?	
26	Does the Entity have an enterprise wide	
20	programme that sets minimum ABC standards?	Yes
27	Has the Entity appointed a designated officer or	
21	officers with sufficient experience/expertise	
	responsible for coordinating the ABC	Yes
	programme?	
28	Does the Entity have adequate staff with	
20	appropriate levels of experience/expertise to	Yes
	implement the ABC programme?	165
29	Is the Entity's ABC programme applicable to:	
		Yes
30	Does the Entity have a global ABC policy that:	
30 a	Prohibits the giving and receiving of bribes?	
	This includes promising, offering, giving,	
	solicitation or receiving of anything of value,	Yes
	directly or indirectly, if improperly intended to	
20 k	influence action or obtain an advantage	
30 b	Includes enhanced requirements regarding interaction with public officials?	Yes
00 -	Includes a prohibition against the falsification of	
30 с	books and records (this may be within the ABC	
	policy or any other policy applicable to the Legal	Yes
	Entity)?	
31	Does the Entity have controls in place to monitor	
31	the effectiveness of their ABC programme?	Yes
32	Does the Entity's Board or Senior Management	
32	Committee receive regular Management	Yes
	Information on ABC matters?	165
33	Does the Entity perform an Enterprise Wide	
55	ABC risk assessment?	No
33 a	If Y select the frequency	
55 a	in a solect the hoquettey	
34	Does the Entity have an ABC residual risk rating	
	that is the net result of the controls effectiveness	Yes
	and the inherent risk assessment?	
35	Does the Entity's ABC EWRA cover the inherent	
	risk components detailed below:	
	<u>'</u>	
35 a	Potential liability created by intermediaries and	
4	other third-party providers as appropriate	Yes
35 b	Corruption risks associated with the countries	
	·	Yes
	directly or through intermediaries	
35 c	Transactions, products or services, including	
	those that involve state-owned or state-	Yes
	controlled entities or public officials	
35 d	Corruption risks associated with gifts and	
	hospitality, hiring/internships, charitable	Yes
	donations and political contributions	
35 e	Changes in business activities that may	
00 E	materially increase the Entity's corruption risk	Yes
36	Does the Entity's internal audit function or other	
	independent third party cover ABC Policies and	INO

37	Does the Entity provide mandatory ABC training to:	
37 a	Board and senior Committee Management	
		Yes
37 b	1st Line of Defence	Yes
37 с	2nd Line of Defence	Yes
37 d	3rd Line of Defence	Yes
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
37 f	Non-employed workers as appropriate (contractors/consultants)	Yes
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	Yes
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
39 b	If appropriate, provide any additional information / context to the answers in this section.	N/A

5. AML	, CTF & SANCTIONS POLICIES & PROCE	EDURES
40	Has the Entity documented policies and	
	procedures consistent with applicable AML, CTF	
	& Sanctions regulations and requirements to	
40 a	reasonably prevent, detect and report:  Money laundering	
40 a	Money laundering	Yes
40 b	Terrorist financing	Yes
		Tes
40 c	Sanctions violations	Yes
41	Are the Entity's policies and procedures updated	
*'	at least annually?	Yes
42	Are the Entity's policies and procedures gapped	
	against/compared to:	
42 a	US Standards	No
42 a1	If Y, does the Entity retain a record of the	
42 a i	results?	Not Applicable
42 b	EU Standards	N.
		No
42 b1	If Y, does the Entity retain a record of the	Not Applicable
43	results?  Does the Entity have policies and procedures	
3	that:	
43 a	Prohibit the opening and keeping of anonymous	Yes
	and fictitious named accounts	169
43 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
43 c	Prohibit dealing with other entities that provide	
45 0	banking services to unlicensed banks	Yes
43 d	Prohibit accounts/relationships with shell banks	Vaa
		Yes
43 e	Prohibit dealing with another entity that provides	Yes
43 f	services to shell banks  Prohibit opening and keeping of accounts for	
131	Section 311 designated entities	Yes
43 g	Prohibit opening and keeping of accounts for	
	any of unlicensed/unregulated remittance	Yes
	agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	
43 h	Assess the risks of relationships with domestic	
	and foreign PEPs, including their family and	Yes
	close associates	
43 i	Define escalation processes for financial crime risk issues	Yes
43 j	Define the process, where appropriate, for	
	terminating existing customer relationships due	Yes
	to financial crime risk	
43 k	Specify how potentially suspicious activity	V.
	identified by employees is to be escalated and investigated	Yes
43 I	Outline the processes regarding screening for	
L	sanctions, PEPs and negative media	Yes
43 m	Outline the processes for the maintenance of	Yes
44	internal "watchlists"	
44	Has the Entity defined a risk tolerance statement or similar document which defines a	Yes
	risk boundary around their business?	
45	Does the Entity have a record retention	Yes
<u> </u>	procedures that comply with applicable laws?	100
45 a	If Y, what is the retention period?	5 years or more
46	Confirm that all responses provided in the	
	above Section POLICIES & PROCEDURES are	Yes
	representative of all the LE's branches	
46 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to.	N/A
46 b	If appropriate, provide any additional information	
1	/ context to the answers in this section.	AVA
		N/A
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	, CTF & SANCTIONS RISK ASSESSMEN	
<b>1</b> 7	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
17 a	Client	Yes
47 b	Product	Yes
47 c	Channel	Yes
47 d	Geography	Yes
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	Yes
48 b	Customer Due Diligence	Yes
48 с	PEP Identification	Yes
48 d	Transaction Screening	Yes
48 e	Name Screening against Adverse Media & Negative News	Yes
48 f	Training and Education	Yes
48 g	Governance	Yes
18 h	Management Information	Yes
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	N/A
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	No
50 b	Product	No
50 c	Channel	No
50 d	Geography	No No

51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	No
51 a	Customer Due Diligence	No
51 b	Transaction Screening	No
51 c	Name Screening	No
51 d	List Management	No
51 e	Training and Education	No
51 f	Governance	No
51 g	Management Information	No
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	No
52 a	If N, provide the date when the last Sanctions EWRA was completed.	N/A
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	Yes
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
53 b	If appropriate, provide any additional information / context to the answers in this section.	A full Sanctions EWRA process as described in the CBDDQ is not implemented at entity level; the Bank's process includes the sanctions control for Customer Due Diligence, Transaction Screening and Name Screening and the evaluation the related controls effectiveness

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	C, CDD and EDD	
54	Does the Entity verify the identity of the customer?	Yes
55	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
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	Yes
56 b	Customer identification	Yes
56 c	Expected activity	Yes
56 d	Nature of business/employment	Yes
56 e	Product usage	Yes
56 f	Purpose and nature of relationship	Yes
56 g	Source of funds	Yes
56 h	Source of wealth	Yes
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	Yes
57 a1	Are ultimate beneficial owners verified?	Yes
57 b	Authorised signatories (where applicable)	Yes
57 c	Key controllers	Yes
57 d	Other relevant parties	Yes
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	10%
59	Does the due diligence process result in customers receiving a risk classification?	Yes

60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60 a	Product Usage	Yes
60 b	Geography	Yes
60 c	Business Type/Industry	Yes
60 d	Legal Entity type	Yes
60 e	Adverse Information	Yes
60 f	Other (specify)	
61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	Yes
62	If Y, is this at:	
62 a	Onboarding	Yes
62 b	KYC renewal	Yes
62 c	Trigger event	Yes
63	What is the method used by the Entity to screen for adverse media / negative news?	Combination of automated and manual
64	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
65	If Y, is this at:	
65 a	Onboarding	Yes
65 b	KYC renewal	Yes
65 c	Trigger event	Yes
66	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
67	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
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	Yes
68 b	Trigger event	Yes
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes

	Te a garage and a second	,
70	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?	
70 a	Non-account customers	Prohibited
70 b	Non-resident customers	EDD & restricted on a risk based approach
70 c	Shell banks	Prohibited
70 d	MVTS/ MSB customers	Prohibited
70 e	PEPs	EDD on a risk based approach
70 f	PEP Related	EDD on a risk based approach
70 g	PEP Close Associate	EDD on a risk based approach
70 h	Correspondent Banks	Do not have this category of customer or industry
70 h1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	
70 i	Arms, defense, military	EDD & restricted on a risk based approach
70 j	Atomic power	Do not have this category of customer or industry
70 k	Extractive industries	EDD on a risk based approach
70 I	Precious metals and stones	EDD & restricted on a risk based approach
70 m	Unregulated charities	Prohibited
70 n	Regulated charities	EDD on a risk based approach
70 o	Red light business / Adult entertainment	EDD & restricted on a risk based approach
70 p	Non-Government Organisations	EDD on a risk based approach
70 q	Virtual currencies	Prohibited
70 r	Marijuana	Do not have this category of customer or industry
70 s	Embassies/Consulates	EDD on a risk based approach
70 t	Gambling	EDD & restricted on a risk based approach
70 u	Payment Service Provider	EDD & restricted on a risk based approach
70 v	Other (specify)	N/A
71	If restricted, provide details of the restriction	The relationship can only be opened with approval of the bank's board of directors
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	Yes
73 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	N/A
73 b	If appropriate, provide any additional information / context to the answers in this section.	N/A
	1	I .

74	Does the Entity have risk based policies,	
74	procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
75	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
76	If manual or combination selected, specify what type of transactions are monitored manually	Some monitoring scenarios require manual information extraction from processing systems
77	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	Yes
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	N/A
79 b	If appropriate, provide any additional information / context to the answers in this section.	N/A

9. PAY	MENT TRANSPARENCY	
80	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
81	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
81 a	FATF Recommendation 16	Yes
81 b	Local Regulations	Yes
81 b1	Specify the regulation	Central Bank and FIU regulations about international wire transfers
81 c	If N, explain	NA
82	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
83	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	Yes
84	Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?	Yes
85	Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	Yes
85 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
85 b	If appropriate, provide any additional information / context to the answers in this section.	N/A

Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions?  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)?  B8 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?  B9 Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?  What is the method used by the Entity?  Combination of automated and manual  Wes the method used by the Entity?  Combination of automated and manual	10. SA	0. SANCTIONS		
a sproved by management regarding compliance with services by applicable to the Entity, including with respect its business conducted with, of through accounts held of the Entity, including with respect its business conducted with, of through accounts held of the Entity have picked accounts or services in a manner causing the other entity to violate and the entity have picked by the entity to the entity have picked provides another entity to violate another entity to violate another entity for where entity for under entity to where entity for entity				
compliance with sanctions law applicable to the Entity, including with resport to business conducted with, or through accounts held at foreign financial institution, the design of the control seasonably designed to prevent the use of another entity's accounts or services sanctions prohibitions applicable to the other entity (including prohibitions within the other entity forbidding prohibitions probable applicable and or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, and a stripping, or the resultmission and/or masking, of sanctions environmental more applicable sanctions prohibitions and stripping, or the resultmission and/or masking, of sanctions environmental more applicable and the prohibition and/or office of the Entity screen its outsomers, including beneficial conversity in formation collected by the Entity of t	00			
Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions?  77 Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity is voicities in a manner causing the other entity in voicities only (recluding prohibinous within the other entity in clouding prohibinous within the other entity in controls reasonably designed to prohibin and/or detect actions taking, of sanctions relevant information in cross border transactions?  88 Does the Entity have policies, procedures or other controls reasonably designed to prohibin and/or detect actions taking, of sanctions relevant information in cross border transactions?  89 Does the Entity screen its customers, including beneficial ownership information collected by the treather against Sanctions List Entity?  90 What is the method used by the Entity?  11 Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?  12 What is the method used by the Entity?  22 What is the method used by the Entity?  23 Select the Sanctions Lists used by the Entity?  24 What is the method used by the Entity?  25 What is the method used by the Entity?  26 Select the Sanctions List (UN)  35 Select the Sanctions List (UN)  36 Select the Sanctions List (UN)  37 Select the Sanctions Security Council Used for screening customers and beneficial owners and for filtering transactional data  38 Consolidated United Notices Repeated and the International Council Used for screening customers and beneficial owners and for filtering transactional data  38 Used for Foreign Assats Control (OFAC)  39 Office of Foreign Assats Control (OFAC)  30 Office of Foreign Assats Control (OFAC)  31 Used for screening customers and beneficial owners and for filtering transactional data  32 Office of Foreign Assats Control (OFAC)  33 Office of Foreign Assats Control (OFAC)  34 Used for screening		, , , , , , , , , , , , , , , , , , , ,		
conducted with, or through accounts held at foreign financial institutions?  77 Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a marmer causing the other entity to violete entity (including prohibitions within the other entity for bodiling and the entity of the entity			Yes	
toreign financial institutions?  7 Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity sections, accounts or services in a manner causing the other entity to violate senations prohibitions splitched for prohibitions applicable to the designation of the controls reasonably designed to prohibit and/or detect actions taken to evade applicable and the services and the controls reasonably designed to prohibit and/or detect actions taken to evade applicable senations prohibitions, such as stripping, or the resubmission and/or massing, of sanctions relevant information in cross border transactions?  89 Does the Entity screen is customers, including beneficial ownership information collected by the Entity of transactions?  90 What is the method used by the Entity?  91 Obest the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?  92 What is the method used by the Entity?  93 Select the Sanctions Lists used by the Entity in its sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?  94 What is the method used by the Entity in its sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?  95 What is the method used by the Entity in its sanctions security Council sanctions. Issue the processes:  96 United States Department of the Treasury's Office of Franciscal Sanctions (FAC)  97 United Pranciscal Sanctions Implementation HMT (OFS)  98 United States Department of the Treasury's Office of Franciscal Sanctions Implementation HMT (OFS)  99 United States Department of the Treasury's Office of Franciscal Sanctions Implementation HMT (OFS)  90 United States Department of the Treasury's Office of Franciscal Sanctions Implementation HMT (OFS)  91 United States Department of the				
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Same day to 2 business days	JJ 1J	Transdottorio		
			Same day to 2 business days	

96	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	Yes
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
97 b	/ context to the answers in this section.	Answer to question 95a refers to the time to complete the screening and revalidation of the existing customer database, the information used for the onboarding process is updated between 2 and 3 business days, for the screening of cross border transactions we use the SWIFT sanctions screening solutions.

11. TR	1. TRAINING & EDUCATION		
98	Does the Entity provide mandatory training, which includes :		
98 a	Identification and reporting of transactions to government authorities	Yes	
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes	
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes	
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes	
98 e	Conduct and Culture	Yes	
99	Is the above mandatory training provided to :		
99 a	Board and Senior Committee Management	Yes	
99 b	1st Line of Defence	Yes	
99 с	2nd Line of Defence	Yes	
99 d	3rd Line of Defence	Yes	
99 e	3rd parties to which specific FCC activities have been outsourced	Not Applicable	
99 f	Non-employed workers (contractors/consultants)	Yes	
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes	
101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes	
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	Yes	
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A	
102 b	If appropriate, provide any additional information / context to the answers in this section.	N/A	

	ALITY ASSURANCE /COMPLIANCE TEST	
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	Yes
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	No
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	Yes
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
105 b	If appropriate, provide any additional information / context to the answers in this section.	The Compliance Testing process is included as part of the Internal Audit reviews and controls.

12 AII	2 AUDIT		
	3. AUDIT		
106	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 and Sanctions policies and practices on a regular basis?	Yes	
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:		
107 a	Internal Audit Department	Yearly	
107 b	External Third Party	Yearly	
108	Does the internal audit function or other independent third party cover the following areas:		
108 a	AML, CTF & Sanctions policy and procedures	Yes	
108 b	KYC / CDD / EDD and underlying methodologies	Yes	
108 c	Transaction Monitoring	Yes	
108 d	Transaction Screening including for sanctions	Yes	
108 e	Name Screening & List Management	Yes	
108 f	Training & Education	Yes	
108 g	Technology	Yes	
108 h	Governance	Yes	
108 i	Reporting/Metrics & Management Information	Yes	
108 j	Suspicious Activity Filing	Yes	
108 k	Enterprise Wide Risk Assessment	Yes	
108 I	Other (specify)	N/A	
109	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes	
110	Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches	Yes	
110 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A	
110 b	If appropriate, provide any additional information / context to the answers in this section.	N/A	

## **Declaration Statement** Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2020 (CBDDQ V1.3) 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) SUDAMERIS BANK SAECA (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 on an annual basis. The Financial Institution commits to file accurate supplemental information on a timely basis. FRANCISCO OLIVERA (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 JUAN CAMERON (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)