the Wolfsberg Group

Financial Institution Name: Location (Country) :

Sudameris Bank SAECA 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, whis 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 No # Question

Answer

1 ENII	TY & OWNERSHIP	Answer
	Full Legal Name	
		Sudameris Bank SAECA
2	Append a list of foreign branches which are covered by	
2	this questionnaire	
	ulis questionitaire	All local branches
		All local branches
3	Full Legal (Registered) Address	
		Independencia Nacional 513
		Asunción, Paraguay
		Nouricon, Faraguay
4	Full Primary Business Address (if different from above)	
•	dir i milary business Address (ii dinorent nom above)	
		N/A
		INVA
5	Date of Entity incorporation/establishment	
	•	30/6/1958
6	Select type of ownership and append an ownership chart	
0	if available	
^ -		
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	l
		N/A
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate	Yes
•	beneficial owners with a holding of 10% or more	HBO: Mr Conor Mo Enroy 79 149/. : Moderdander Einsteinier M.
	and the state of t	UBO: Mr Conor Mc Enroy 78,11%; Nederlandse Financierings-Maatschappij voor Ontwikkelingslanden N.V.(FMO) 15%
	•	(N.V.(1 MO) 1370
_		
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)?	140
8 a	If Y, provide the name of the relevant branch/es which	
0	operate under an OBL	
		N/A
		, I NA
		í ·
9	Does the Bank have a Virtual Bank License or provide	
	services only through online channels?	no
10	Name of primary financial regulator/supervisory authority	
		<i>i</i>
	1	Banco Central del Paraguay
		,
11	Provide Legal Entity Identifier (LEI) if available	
) 1	Provide Legal Childy Identifier (LCI) if available	
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	ľ	2549006DVXEOF1JIKY44
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	
		N/A Go A
	1	e pon
13	Jurisdiction of licensing authority and regulator of ultimate	
	parent	
	1	N/A
	ì	N/A
		N/A Gerent

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14.a. Select the business areas applicable to the Entity	
14 a Retail Banking Ves 14 b Private Banking No 14 c Commercial Banking Yes 14 d Transactional Banking No 14 d Investment Banking No 14 d Investment Banking No 14 d Investment Banking No 14 f Financial Markest Trading No 14 g Securities Services/Custody No 14 h Broker/Dealer No 14 h Broker/Dealer No 14 l Muttilateral Development Bank No 14 l Wealth Management No 14 l Wealth Management No 14 l Wealth Management No 15 Obes the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of als revenue from non-resident customers (Non-purished Customers or does it derive more than 10% of als revenue from non-resident customers (Non-purished Customers or does it derive more than 10% of als revenue customers primarily resident in a different provided) 15 a If Y, provide the top five countries where the non-resident customers are located. 16 Select the closest value: 16 a Number of employees SO1-1000 17 a Confirm that all responses provided in the above Section are representative of all the LE's branches. 17 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 18 If appropriate, provide any additional information/context to the answers in this section. 19 a Correspondent Banking 19 a Correspondent Banking 19 and Does the Entity offer the following products and services: 19 a Does the Entity offer the rorespondent Banking services to domestic banks? 19 at Does the Entity offer Correspondent Banking services to domestic banks? 19 at Does the Entity offer Correspondent Banking services to domestic banks? 19 at Does the Entity offer Correspondent Banking services to foreign banks? 19 at Does the Entity flow roresment relationships with domestic banks? 19 at Does the Entity flow roresment relationships with domestic banks? 19 at Does the Entity flow rorespondent Banking services to the guited Money Services Businesses (MDSs)Money Value Transfer Services (MUTSs)? 19 at Does the Entity allow downstream relationships with forei	
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19 a1h1 MSBs	
19 a1h2 MVTSs	
19 a1h3 PSPs	Gertino.

	Does the Entity have processes and procedures in place to identify downstream relationships with	
	MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No
19 с	Cross-Border Remittances	No
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No
19 f	International Cash Letter	No
19 g	Low Price Securities	No
9 h	Payable Through Accounts	No
9 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	Yes
19 i1	If Y , please select all that apply below?	
19 i2	Third Party Payment Service Providers	Yes
19 i3	Virtual Asset Service Providers (VASPs)	No
19 i4	eCommerce Platforms	Yes
9 i5	Other - Please explain	N/A
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No No
191	Sponsoring Private ATMs	No
9 m	Stored Value Instruments	No
9 n	Trade Finance	Yes
9 o	Virtual Assets	No
9 p	For each of the following please state whether you offer the service to walk-in customers and if so, the	
19 p1	applicable level of due diligence:	
9 p1a	Check cashing service If yes, state the applicable level of due diligence	No
9 p1a	Wire transfers	No
) p2a	If yes, state the applicable level of due diligence	
9 p3	Foreign currency conversion	No
9 p3a	If yes, state the applicable level of due diligence	
9 p4	Sale of Monetary Instruments	No
p4a	If yes, state the applicable level of due diligence	
9 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	N/A
20	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches.	Yes
0 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
:1	If appropriate, provide any additional information/context to the answers in this section.	N/A
. AML. C	TF & SANCTIONS PROGRAMME	
2	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
2 a		Voc
b b	Appointed Officer with sufficient experience/expertise Adverse Information Screening	Yes
	Beneficial Ownership	Yes Yes
c	Cash Reporting	Yes Yes
	CDD	Yes
d		
d e	EDD	
d e f	EDD	Yes
d de df	EDD Independent Testing	Yes
d de de de de de	EDD Independent Testing Periodic Review	Yes
2 d 2 e 2 f 2 g 2 h 2 i	EDD Independent Testing Periodic Review	Yes
2 c 2 d 2 e 2 f 2 g 2 h 2 i 2 j	EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Yes Yes

22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML,	11-100
24	CTF & Sanctions Compliance Department? Is the Entity's AML, CTF & Sanctions policy approved at	***************************************
	least annually by the Board or equivalent Senior	
	Management Committee? If N, describe your practice in	Yes
	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	No
	components of its AML, CTF & Sanctions programme?	
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	Yes
28 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
		N/A
29	If appropriate, provide any additional information/context	
	to the answers in this section.	
		N/A
4 4 2 1		
	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and	Yes
	requirements to reasonably prevent, detect and report	
31	bribery and corruption? 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	
	with sufficient experience/expertise responsible for	Yes
	coordinating the ABC programme?	
33	Does the Entity have adequate staff with appropriate	
	levels of experience/expertise to implement the ABC	Yes
	programme?	
34	Is the Entity's ABC programme applicable to:	Third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This	
	includes promising, offering, giving, solicitation or	I
	receiving of anything of value, directly or indirectly, if	Yes
	improperly intended to influence action or obtain an	
35 b	advantage	
35 D	Includes enhanced requirements regarding interaction with public officials?	Yes
35 с	Includes a prohibition against the falsification of books	
	and records (this may be within the ABC policy or any	
	other policy applicable to the Legal Entity)?	Yes
	mer pener approache to the Logor Linky):	
36	Does the Entity have controls in place to monitor the	Yes
17	effectiveness of their ABC programme?	
37	Does the Board receive, assess, and challenge regular	Yes
	reporting on the status of the ABC programme?	
38	Has the Entity's ABC Enterprise Wide Risk Assessment	
	(EWRA) been completed in the last 12 months?	No
	(= · · · · · · · · · · · · · · · · · · ·	·
38 a	If N, provide the date when the last ABC EWRA was	
18 a	If N, provide the date when the last ABC EWRA was completed.	EWDA will be implemented during 2004
18 a	If N, provide the date when the last ABC EWRA was completed.	EWRA will be implemented during 2024
38 a	If N, provide the date when the last ABC EWRA was completed.	EWRA will be implemented during 2024
	If N, provide the date when the last ABC EWRA was completed.	EWRA will be implemented during 2024
	If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is	
	If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is	No Control of the Con
39	If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the	No Control of the Con
39	If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below:	No Control of the Con
39	If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other	No Control of the Con
39 40 40 a	If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate	No Control of the Con
39 40 40 a	If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and	No Control of the Con
39 10	If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or	No Control of the Con
39 40 40 a	If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	No Control of the Con
39 10 10 a	If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those	No Control of the Con
38 a 39 40 40 a 40 b	If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	No Cerente la

Contraction in this associated with pits and hospitality No No No No No No No N			
procease the Entity's compation risk 1 Does the Entity's Internal audit function or other independent timic party cover ASC Policies and Peter School Committee of the Entity's Committee Management Peter School	40 d	hiring/internships, charitable donations and political	No
41 Does the Entity's internal audit function or other endequendent third party over ABC Policides and Proceededs? 42 Proceededs? 43 Description of the Entity's internal audit function or other process. Proceedings of the Entity through the Entity town of the results? 44 Description of the Entity through the Entity of the Entity sources that the applies to a process or regulations and requirements to reasonably prevent, detection of the Entity species and procedures under the Entity species and procedures and procedures and entity. 45 Description of the Entity through the Entity of the Entity sources that this applies to a procedure through the Entity through the Ent	40 e		No .
42 b Sourd and serior Committee Management Yes 42 b St Line of Defence Yes 42 c 2nd Line of Defence Yes 42 d 3rd Line of Defence Yes 43 d 3rd Line of Defence Yes 44 d 3rd Line of Defence Yes 45 c 45 Third parties to which specific compliance activities 46 subject to ASE in Khar be been outsourced 47 Nor-employed workers as appropriate Yes 48 c 47 Confirm that all responsibilities and activities? 49 Confirm that all response provided in the above Section are representative of all the LE's transhes 40 a If N. Carliny which questions the difference/a relate to and the branch/es that this applies to. NIA 46 If appropriate, provide any additional information/context to the answers in this section. NIA 46 If appropriate, provide any additional information/context to the answers in this section. NIA 46 If as the Entity documented policies and procedures consistent with applicate AMI, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report 46 a Morrey laundering Yes 46 b Terrorist financing Yes 46 c Sanctions volations 47 Are the Entity chosen to compare its policies and procedures updated at least Yes 48 a U.S. Standards 48 a U.S. Standards 49 a Prohibit december and except of the results? 49 Dees the Entity retain a record of the results? 49 Dees the Entity retain a record of the results? 49 Prohibit december and except of accounts for Policies and procedures that the Policies and procedures that the Policies and procedures updated at least Yes 49 Prohibit december and ackepting of accounts for Yes 49 Prohibit december and excepting of accounts for Yes 49 Prohibit december and excepting of accounts for any of the Policies and procedures that the Policies	41	Does the Entity's internal audit function or other independent third party cover ABC Policies and	Yes
42 a Board and senior Committee Management Yes 42 b 1st Line of Defence Yes 42 c 2nd Line of Defence Yes 42 d 3rd Line of Defence Yes 42 d 3rd Line of Defence Yes 42 d 3rd Line of Defence Yes 44 a Third parties to which specific complaine activities subject to ASE first have been outsourced 44 T Non-employed workers as appropriate Yes 44 Committee Commit	42		
42 d. 2 d. Value of Defence 42 d. 3 d. Une of Defence 42 d. Third parties to which specific compliance activities subject to ABC risk have been outcourced 42 f. Non-employed workers as appropriate Commactoriscionalistris) 43 Does the Entity provide ABC braining that is targeted to Commactoriscionalistris 44 Does the Entity provide ABC braining that is targeted to Commactoriscionalistris 45 Does the Entity provide ABC braining that is targeted to Commactoriscionalistris 46 Does the Entity provide ABC braining that is targeted to Commactoriscionalistris 47 All Cardy which geastions the difference's relate to and the branch/es that this applies to NIA 46 If appropriate, provide any additional information/context to the answers in this section. NIA 46 If appropriate, provide any additional information/context to the answers in this section. NIA 46 All Defence Commander Comman	42 a	Board and senior Committee Management	Yes
42 d. 2nd Line of Defence 42 d. 3nd Line of Defence 42 d. Third parties to which specific compliance activities subject to ASC risk have been outsourced 42 f. Non-employed workers as appropriate Contracticities of the way been outsourced 43 d. Contracticities of the way been outsourced 44 d. Confirm that all response provided in the store Section are representative of all the LE's branches 44 a. If N. Cardiy which specific roles, responsibilities and activities? 45 l. R. Cardiy which specific roles, responsibilities and activities? 46 l. R. Cardiy which specific roles, responsibilities and activities? 47 l. Cardiy which specific roles in the source of the specific roles in the specific role in the specif	42 b	1st Line of Defence	Yes
42 e Trind parties to which specific compliance activities subject to ABC risk have been outsourced vesses and outsides? 44 a Description of the ABC training that is targeted to specific risk and the branch/se that this applies to. ABC If appropriate, provide any additional information/context to the entwers in this section. ABC If appropriate, provide any additional information/context to the entwers in this section. ABC If appropriate, provide any additional information/context to the entwers in this section. ABC If appropriate, provide any additional information/context to the entwers in this section. ABC If appropriate, provide any additional information/context to the entwers in this section. ABC If appropriate, provide any additional information/context to the entwers in this section. ABC If appropriate, provide any additional information/context to the entwers in this section. ABC If appropriate, provide any additional information/context to the entwerse in this section. ABC If appropriate, provide any additional information/context to the entwerse in this section. ABC If appropriate, provide any additional information/context to the entwerse in this section. ABC If appropriate, provide any additional information/context to the entwerse in this section. ABC If appropriate provides and procedures outside any entwerse and entwerse any entwerse and entwerse any entwerse and entwerse any entwerse and entwerse any entwerse and	42 c	2nd Line of Defence	
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43 Does the Entity prouds ABC training that is targeted to specific roles, responsibilities and activities? 44 Confirm that all responses provided in the above Section are representative of all the LE's branches 44 a If N. Carly which questions the difference/s relate to and the branches that this applies to. 45 If appropriate, provide any additional information/context to the answers in this section. NIA 45 If appropriate, provide any additional information/context to the answers in this section. NIA 46 Assess the Entity columented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, debet and report. 46 Assess the Entity columented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to assonably prevent, debet and report. 46 Assess the Entity selects and procedures updated at least annually? 47 Are the Entity's policies and procedures updated at least annually? 48 Has the Entity chosen to compare its policies and procedures against. 49 Assess the Entity relation are cord of the results? 49 Assess the Entity relation are cord of the results? 49 Does the Entity prelation and results? 49 Prohibit dealing with other entities that provide banking services and procedures and for NBFIs 49 Prohibit dealing with other entities that provide banking services to urineersed banks 49 Prohibit dealing with other entities that provide banking services to urineersed banks 49 Prohibit dealing with other entities that provide banking services to urineerse to banks 49 Prohibit dealing with other entities that provide banking services to urineerse to banks 49 Prohibit dealing with other entities that provide banking services to urineerse to banks 49 Prohibit dealing with other entities that provide banking services to urineerse to banks 49 Prohibit dealing with other entities that provide banking services to urineerse to banks 49 Prohibit dealing with other entities that provide banks of the	42 e		
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to the answers in this section. N/A 5. AML, CTF & SANCTIONS POLICIES & PROCEDURES	44 a		N/A
Has the Entity documented policies and procedures consistent with applicable AML_CTF & Sanctions regulations and requirements to reasonably prevent, detect and report. 46 a Money laundering Yes 46 b Terrorist financing Yes 5 Arc the Entity's policies and procedures updated at least annually? 48 Has the Entity chosen to compare its policies and procedures against: 48 U.S. Standards 48 a U.S. Standards 48 a If Y, does the Entity retain a record of the results? 48 b EU Standards 48 b If Y, does the Entity retain a record of the results? 49 Does the Entity have policies and procedures that fitting and keeping of accounts for unilicensed banks and/or NBFIs 49 c Prohibit the opening and keeping of accounts for unilicensed banks and/or NBFIs 49 d Prohibit dealing with other entitles that provide banking services to unilicensed banks 49 e Prohibit dealing with ther entitle shell bank yes 49 f Prohibit dealing with ther provides services to shell banks 49 g Prohibit dealing with ther entitle shell banks 49 g Prohibit dealing with the propering and keeping of accounts for audicensed danks and/or NBFIs 49 g Prohibit dealing with the propering and keeping of accounts for section 311 designated entities 49 g Prohibit dealing with another entity that provides services to shell banks 49 g Prohibit dealing with there one of the propering and keeping of accounts for any of unilicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents 49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close	45		N/A
consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 46 a Money laundering Yes 46 b Terroist financing Yes 46 c Sanctions violations Yes 47 Are the Entity's policies and procedures updated at least annually? 48 Has the Entity chosen to compare its policies and procedures against 48 a U.S. Standards Yes 48 b U.S. Standards Yes 48 b EU Standards Yes 48 b EU Standards Yes 48 b EU Standards Yes 48 b Forbibit depening and keeping of anonymous and fictitious named accounts 49 a Prohibit the opening and keeping of accounts for unilicensed banks and/or NBFIs Yes 49 c Prohibit dealing with other entities that provide banking services to unlicensed banks 49 d Prohibit dealing with another entity that provides services to shell banks 49 f Prohibit dealing with another entity that provides services to shell banks 49 f Prohibit dealing with another entity that provides services to shell banks yes 49 f Prohibit dealing with another entity that provides services to shell banks yes 49 f Prohibit dealing with another entity that provides services to shell banks yes 49 f Prohibit dealing with another entity that provides services to shell banks yes 49 f Prohibit dealing with another entity that provides services to shell banks yes 49 f Prohibit dealing with another entity that provides services to shell banks yes 49 f Prohibit dealing with another entity that provides yes 50 services to shell banks yes 49 f Prohibit dealing with another entity that provides yes 50 services to shell banks yes 50 yes 51 yes 52 yes 53 yes 54 yes 55 yes 56 yes 57 yes 58 yes 57 yes 58 yes 58 yes 59 yes 50 y			
46 b Terrorist financing Yes	40	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent,	
46 c Sanctions violations Yes Yes Yes Yes Yes Are the Entity's policies and procedures updated at least annually? Are the Entity chosen to compare its policies and procedures against. Yes As the Entity chosen to compare its policies and procedures against. Yes As a U.S. Standards Yes As a U.S. Standards Yes As a U.S. Standards Yes As b EU Standards Yes As b EU Standards Yes As b EU Standards Yes As b If Y, does the Entity retain a record of the results? Yes As b If Y, does the Entity retain a record of the results? Yes As b If Y, does the Entity retain a record of the results? Yes As b If Y, does the Entity retain a record of the results? Yes As b If Y, does the Entity retain a record of the results? Yes As b Prohibit the opening and keeping of anonymous and fictitious named accounts Yes Yes Yes Yes As a condition of the prohibit dealing with other entities that provide banking services to unlicensed banks Yes	46 a	Money laundering	Yes
Are the Entity's policies and procedures updated at least annually? 48	46 b		
### Assess the risks of relationships with domestic and procedures against. ### Assess the risks of relationships with domestic and foreign PEPs, including their against. #### Assess the risks of relationships with domestic and foreign PEPs, including their against.	46 c	Sanctions violations	Yes
procedures against: 48 a U.S. Standards 48 b EU Standards 48 b EU Standards 49 c Prohibit dealing with other entities that provide banking services to unlicensed banks 49 d Prohibit opening and keeping of accounts for services to shell banks 49 d Prohibit opening and keeping of accounts for services to shell banks 49 d Prohibit opening and keeping of accounts for ounlicensed banks 49 d Prohibit dealing with other entities that provide banking services to unlicensed banks 49 d Prohibit opening and keeping of accounts for ounlicensed banks 49 d Prohibit dealing with another entity that provides services to shell banks 49 d Prohibit opening and keeping of accounts for services to shell banks 49 d Prohibit opening and keeping of accounts for section 311 designated entities 49 d 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 49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close 49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close	47		Yes
1	48		
48 b EU Standards Yes 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 49 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs 49 c Prohibit dealing with other entities that provide banking services to unlicensed banks 49 d Prohibit accounts/relationships with shell banks 49 d Prohibit dealing with another entity that provides services to shell banks 49 e Prohibit opening and keeping of accounts for Section 311 designated entities 49 f Prohibit opening and keeping of accounts for any of unlicensed/urregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents 49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close Yes	48 a	U.S. Standards	Yes
If Y, does the Entity retain a record of the results?	48 a1	If Y, does the Entity retain a record of the results?	
AB b1			Yes
Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Assess the risks of relationships with domestic and foreign PEPs, including their family and close Yes	48 b1		
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banking services to unlicensed banks 49 d Prohibit accounts/relationships with shell banks Yes 49 e Prohibit dealing with another entity that provides services to shell banks 49 f Prohibit opening and keeping of accounts for Section 311 designated entities 49 g Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents 49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close Yes Yes		unlicensed banks and/or NBFIs	Yes
49 e Prohibit dealing with another entity that provides services to shell banks 49 f Prohibit opening and keeping of accounts for Section 311 designated entities 49 g Prohibit opening and keeping of accounts for any of unlicensed/urregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents 49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close Yes Yes		banking services to unlicensed banks	Yes
services to shell banks 49 f Prohibit opening and keeping of accounts for Section 311 designated entities 49 g Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents 49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close Yes			Yes
311 designated entities 49 g Prohibit opening and keeping of accounts for any of unlicensed/urregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents 49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close Yes		services to shell banks	Yes
unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents 49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close Yes		311 designated entities	Yes
49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close Yes	49 g	unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or	Yes
	49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close	Yes

	Define the process for escalating financial crime risk	Ven
	issues/potentially suspicious activity identified by employees	Yes
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime	Yes
49 k	risk Define the process for exiting clients for financial	
+3 K	crime reasons that applies across the entity, including foreign branches and affiliates	Yes
49 I	Define the process and controls to identify and handle	
	customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes
19 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
19 n	Outline the processes for the maintenance of internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around	Yes
51	their business? Does the Entity have record retention procedures that	Yes
1 a	comply with applicable laws? If Y, what is the retention period?	
	·	5 years or more
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
		N/A
53	If appropriate, provide any additional information/context	
	to the answers in this section.	N/A
. AML, C	IF & SANCTIONS RISK ASSESSMENT	
	Does the Entity's AML & CTF EWRA cover the inherent	
4 4 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes
4 a 4 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Yes
4 a 4 b 4 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes Yes
4 a 4 b 4 c 4 d 5	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes
4 a 4 b 4 c 4 d 5 5 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
4 a 4 b 4 c 4 d 5 5 a 5 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	Yes Yes Yes Yes
4 a 4 b 4 c 4 d 5 5 a 5 b 5 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
4 a 4 b 4 c 4 d 5 5 5 a 5 b 5 c 5 d 5 e	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes Yes Yes Yes
4 a 4 b 4 c 4 d 5 5 5 a 5 b 5 c 5 5 d 5 6	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 Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d d 55 5 a 55 c 55 d 55 c 55 f 55 g	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes
54 a 54 b 54 c 54 c 55 c 55 a 55 c 55 c 55 c 55 d 65 c 55 f	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	Yes
54 a 64 b 64 c 64 d 65 5 5 c 65 5 d 65 5 6 5 6 6 6 6 6 6 6 6 6 6 6 6	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 64 b 64 c 64 d 65 5 5 c 65 5 d 65 5 6 5 6 6 6 6 6 6 6 6 6 6 6 6	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
64 a 64 b 64 c 64 c 65 c 65 c 65 c 65 c 65 c 65 c 66 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
4 a 4 b 4 c 4 d b 5 5 5 a 5 5 b 5 5 c 5 5 d 5 5 e 6 5 f 6 5 h 6 6 6 a 6 7 7 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
la la lb lc lc ld la lb lc ld lc ld lc ld lc ld la lb lc lc ld lc lc ld lc	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
4 4 a 4 b 4 c 4 d b 5 5 c 5 a 5 b 5 c 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6	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
4 a 4 b 4 c 4 d b 5 5 c 5 d 5 5 c 5 d 5 5 e 6 5 f 6 5 h 6 6 a 6 c 6 c 6 c 6 c 6 c 6 c 6 c 6 c 6	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
4 a 4 b 4 c 4 d b 5 5 c 5 d 5 5 c 5 d 5 5 e 6 5 f 6 5 h 6 6 a 6 c 6 c 6 c 6 c 6 c 6 c 6 c 6 c 6	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
44 a 44 b 44 c 4 d d 5 5 c 5 c 6 5 5 d 6 6 a 7 7 a 7 b 7 c 7 d 3 3	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 a 54 a 54 b 54 c 54 c 55 a 55 c 55 c 55 c 55 d 56 c 6 a 7 7 a 7 b 7 c 7 d 8	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	Yes
54 a 54 b 54 c 54 d d 55 5 a 55 c 55 d 55 c 55 f 55 g	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance 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 N	Yes

58 e	Name Screening	No
8 e 8 f		No
		No
3 g	Has the Entity's Sanctions EWRA been completed in the	
9	last 12 months?	No Section 1997 The Sec
•	If N, provide the date when the last Sanctions EWRA	
19 a	was completed.	See 61
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
61	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 independent evaluation of the effectiveness of these controls.
7. KYC. C	DDD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	g the same of
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 с	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	10%
67	Does the due diligence process result in customers receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
C7 a4		Yes
67 a1	Product Usage	Yes
67 a2	Geography Rusinoss Type/Industry	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type Adverse Information	Yes
67 a5 67 a6	Other (specify)	N/A
68	For high risk non-individual customers, is a site visit a par of your KYC process?	[†] Yes
68 a	If Y, is this at: Onboarding	Yes
68 a1	KYC renewal	Yes
68 a2		Yes
68 a3	Trigger event Other	No
68 a4 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 Yes Yes Yes
69 a	If Y, is this at:	
		Yes
69 a1 69 a2	Onboarding KYC renewal	Yes

a3	Trigger event	Yes	1
	What is the method used by the Entity to screen for		
	Adverse Media/Negative News?	Combination of automated and manual	رة أر
	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	
a	If Y, is this at:		11.00
l a1	Onboarding	Yes	
l a2	KYC renewal	Yes	
a3	Trigger event	Yes	
	What is the method used by the Entity to screen PEPs?	Combination of automated and manual	
3	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether	Yes	
	they are PEPs, or controlled by PEPs?		
4 4 a	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes	
4 a1	If yes, select all that apply: Less than one year	No.	
1 a 2	1 – 2 years	No Yes	
4 a3	3 – 4 years	Yes	
4 a4	5 years or more	No No	
4 a5	Trigger-based or perpetual monitoring reviews	Yes	
'4 a6	Other (Please specify)	No	
'5	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes	
6	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?		
6 a	Arms, defence, military	Prohibited	
6 b	Respondent Banks	Do not have this category of customer or industry	
'6 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes	
3 C	Embassies/Consulates	Always subject to EDD	
3 d	Extractive industries	Always subject to EDD	
e	Gambling customers	Restricted	
S f	General Trading Companies	Always subject to EDD	
ig ih	Marijuana-related Entities MSB/MVTS customers	Restricted	
3 i	Non-account customers	Restricted	
; <u> </u>	Non-Government Organisations	Prohibited Always subject to EDD	
ik		Always subject to EDD Always subject to EDD	
5 I	Nuclear power	Do not have this category of customer or industry	
6 m	Payment Service Providers	Restricted	
n		Always subject to EDD	
6 o	PEP Close Associates	Always subject to EDD	
i p	PEP Related	Always subject to EDD	
i q	Precious metals and stones	Restricted	
r		Restricted	ţ
s	Regulated charities	Always subject to EDD	1
t		Prohibited	1
i v	Travel and Tour Companies	Always subject to EDD	1
s w		Prohibited	1
s w		Restricted	/
S y	Other (specify)	Restricted	\ =
7	If restricted, provide details of the restriction	The relationship can only be opened with approval of the bank's board of directors Yes	Poisco
			(1) U (1)
8	Does EDD require senior business management and/or	Yes	- VIVI W

78 a	If Y indicate who provides the approval:	Both	
79	Does the Entity have specific procedures for onboarding		. f #44
	entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Yes	
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes	
81	Confirm that all responses provided in the above Section		46 15.
	are representative of all the LE's branches	Yes	
81 a	If N, clarify which questions the difference/s relate to		
	and the branch/es that this applies to	l	
		N/A	
82	If appropriate, provide any additional information/context		
	to the answers in this section.	l	
		N/A	
•			
8. MONIT	ORING & REPORTING		
83	Does the Entity have risk based policies, procedures and		
	monitoring processes for the identification and reporting	Yes	
	of suspicious activity?		
84	What is the method used by the Entity to monitor	Automated	
84 a	transactions for suspicious activities? If manual or combination selected, specify what type		
37 a	of transactions are monitored manually		
		N/A	
84 b	If automated as combination collected are interest		
04 D	If automated or combination selected, are internal system or vendor-sourced tools used?	Internal System	
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is		
	the name of the vendor/tool?		
		N/A	
84 b2	When was the tool last updated?	< 1 year	
84 b3	When was the automated Transaction Monitoring	- Tyou	
04 03	application last calibrated?	< 1 year	
85	Does the Entity have regulatory requirements to report	Yes	
	suspicious transactions?	Tes .	
85 a	If Y, does the Entity have policies, procedures and		
	processes to comply with suspicious transaction reporting requirements?	Yes	
86	Does the Entity have policies, procedures and processes		
	to review and escalate matters arising from the	Yes	
	monitoring of customer transactions and activity?		
87	Does the Entity have a data quality management		
	programme to ensure that complete data for all	Yes	
	transactions are subject to monitoring?		
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a	Yes	
	timely manner?	Tes .	
89	Does the Entity have processes in place to send		
	Requests for Information (RFIs) to their customers in a	Yes	
	timely manner?		
90	Confirm that all responses provided in the above Section	Yes	\
90 a	are representative of all the LE's branches If N, clarify which questions the difference/s relate to		1
Jua	and the branch/es that this applies to		\
	and the second s	N/A	1
			\
91	If appropriate, provide any additional information/context		1
J1	to the answers in this section.		1
	to the district in this destion.	N/A	\
			10
DA1/20-	 NTTPANSDADENCY		1) (
92 PAYME	NT TRANSPARENCY Does the Entity adhere to the Wolfsberg Group Payment		17
92	Transparency Standards?	Yes	1
	Transparonoj Omnanao		encisco Olin
		Šs. 19	% . \
		Pan.	Will !
			0,50-
			100 A
		4	Walls Vil
			The Contraction
			J. S. S.
			<i>" </i>
			/

			i
3	Does the Entity have policies, procedures and processes		i
	to comply with and have controls in place to ensure		i .
	compliance with:		2.64
93 a		Yes	i
93 b		Yes	i
93 b1	If Y, specify the regulation	·]	45
	1	Local FIU regulations	
	1	Local Figure 10 Togethalons	4
			ı
93 c	If N, explain		ı
	<u>'</u>	İ	ı
	·		i
	!		i
A4	Does the Entity have controls to support the inclusion of		i
94		Yes	i
	border payment messages?		i
95	Does the Entity have controls to support the inclusion of		i
.5	required beneficiary information cross-border payment	Yes	1
	messages?		1
95 a	If Y, does the Entity have procedures to include		1
• -		Yes	1
	payments?		1
96	Confirm that all responses provided in the above Section	Yes	1
	are representative of all the LE's branches	165	1
96 a	If N, clarify which questions the difference/s relate to		i
	and the branch/es that this applies to.		1
	'		i
	'		i
97	If appropriate, provide any additional information/context		i
"	to the answers in this section.		i
	to the district of the second	N/A	i
	,		i
The second section of the s			1
10. SANCT	TIONS		i
98	Does the Entity have a Sanctions Policy approved by		i
	management regarding compliance with sanctions law		i .
		Yes	ı
	business conducted with, or through accounts held at		4
	foreign financial institutions?		1
99	Does the Entity have policies, procedures, or other		í
	controls reasonably designed to prevent the use of		i
	another entity's accounts or services in a manner causing	Yae	1
	the other entity to violate sanctions prohibitions applicable	1	1
	to the other entity (including prohibitions within the other	1	1
	entity's local jurisdiction)?		4
100	Does the Entity have policies, procedures or other		1
	controls reasonably designed to prohibit and/or detect	!	1
	actions taken to evade applicable sanctions prohibitions,	Yes	f
	deli de empping, er die reedemeeren ander maans, er	Yes	í
	sanctions relevant information in cross border	!	1
	transactions?		Í
101	Does the Entity screen its customers, including beneficial		1
,	ownership information collected by the Entity, during	Yes	fχ
	onboarding and regularly thereafter against Sanctions	res	1 \
	Lists?		1 /
102	What is the method used by the Entity for sanctions	Both Automated and Manual	(\ \
	screening?	DOUT Automated and Manual	1 \
102 a	If 'automated' or 'both automated and manual'	the state of the s	1 \
	selected:		f \
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools	1 \
102 a1a	If a 'vendor-sourced tool' or 'both' selected,	!	1 \
	what is the name of the vendor/tool?	LSEG World-Check / SWIFT Transaction Screening tool	$1 - \chi$
			1
			J \
102 a2	When did you last test the effectiveness (of finding		.)
	true matches) and completeness (lack of missing	0 M	Vin /
	data) of the matching configuration of the	1-2 years	Maple
	automated tool? (If 'Other' please explain in		FM 750
	Question 110)		1.67.0
103	Does the Entity screen all sanctions relevant data,	1	Cencisco Stoppinision
	including at a minimum, entity and location information,	Yes	A Age
	contained in cross border transactions against Sanctions	,	1 19/
	Lists?	La 11 12 A L distribution of	1 "
104	What is the method used by the Entity?	Combination of automated and manual	1
105	Does the Entity have a data quality management		1
	programme to ensure that complete data for all	No ,	1
	transactions are subject to sanctions screening?		1
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:		.1
	Consolidated United Nations Security Council	DESCRIBERT SCHOOL CONTROL CONT	1
106 a		Used for screening customers and beneficial owners and for filtering transactional data	1

106 c	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	N/A
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	Within 3 to 5 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.	N/A
11. TRAINII	NG & EDUCATION	
11	Does the Entity provide mandatory training, which	
111 a	includes: Identification and reporting of transactions to	Yes
111 b	government authorities Examples of different forms of money laundering,	
111 c	terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering,	
	terrorist financing and sanctions violations	Yes
11 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
11 e	Conduct and Culture	Yes
11 f	Fraud	Yes
12	Is the above mandatory training provided to :	
12 a	Board and Senior Committee Management	Yes
	1st Line of Defence	Yes
112 с	2nd Line of Defence	Yes
12 c 12 d	3rd Line of Defence	
112 c 112 d	3rd Line of Defence Third parties to which specific FCC activities have	Yes Yes
112 c 112 d 112 e	3rd Line of Defence Third parties to which specific FCC activities have been outsourced	Yes Yes Not Applicable
112 b 112 c 112 d 112 e 112 f 113	3rd Line of Defence Third parties to which specific FCC activities have	Yes Yes
12 c 12 d 12 e	3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities? Does the Entity provide customised training for AML, CTF	Yes Yes Not Applicable Yes
12 c 12 d 12 e 12 f 13	3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities? Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes Yes Not Applicable Yes Yes Yes
12 c 12 d 12 e 12 f 13	3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities? Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes Yes Not Applicable Yes Yes

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		1
	and the branchies that this applies to.	N/A	7 40
		TUA .	1
116	If conceptiate provide any additional information (1
110	If appropriate, provide any additional information/context to the answers in this section.		1
	to the anomora in this section.	N/A	M- 11/10
			l
I42 OHAL	LITY ASSURANCE /COMPLIANCE TESTING		l .
117 117			1
117	Does the Entity have a program wide risk based Quality		i
	Assurance programme for financial crime (separate from the independent Audit function)?	No	l .
118	Does the Entity have a program wide risk based		i
110	Compliance Testing process (separate from the	No	i .
	independent Audit function)?	100	ı
119	Confirm that all responses provided in the above Section		l .
	are representative of all the LE's branches	Yes	i
119 a	If N, clarify which questions the difference/s relate to		i
	and the branch/es that this applies to.		i
		N/A	i
			i
120	If a promise was ide and different in the second		1
120	If appropriate, provide any additional information/context		i
	to the answers in this section.	The Orange Testing	1
		The Compliance Testing process is included as part of the Internal Audit reviews and controls.	
13. AUDIT			
121	In addition to inspections by the government		
	supervisors/regulators, does the Entity have an internal		
	audit function, a testing function or other independent	l	
	third party, or both, that assesses FCC AMI_CTF_ABC	Yes	
	Fraud and Sanctions policies and practices on a regular		
	basis?		
122	How often is the Entity audited on its AML, CTF, ABC,		
	Fraud and Sanctions programme by the following:		
122 a	Internal Audit Department	Yearly	
122 b	External Third Party	Yearly	
123	Does the internal audit function or other independent third	l Carry	
	party cover the following areas:		
123 a	AML, CTF, ABC, Fraud and Sanctions policy and		
	procedures	Yes	
123 b	Enterprise Wide Risk Assessment	No	
123 с	Governance	Yes	
123 d	KYC/CDD/EDD and underlying methodologies	Yes	
123 e	Name Screening & List Management	Yes	
123 f	Reporting/Metrics & Management Information	Yes	
123 g	Suspicious Activity Filing	Yes	
123 h	Technology	Yes	
123 i	Transaction Monitoring	Yes	
123 j	T	Yes	
123 k	Training & Education	Yes	
123	Other (specify)		
	1		
	ļ	N/A	
124	Associations finding for internal Control of		
.24	Are adverse findings from internal & external audit		\
	tracked to completion and assessed for adequacy and completeness?	Yes	\
125			1
.25	Confirm that all responses provided in the above section are representative of all the LE's branches.	Yes	\
25 a	If N, clarify which questions the difference/s relate to		\
20 a	and the branch/es that this applies to.		1
		N/A	1
		TV/A	\
			10
26	If appropriate, provide any additional information/context		1 1
	to the answers in this section.	N	\ \
	l l	N/A	· /~
		"SY PARTY	Mars \
4. FRAU		Yes Yes	1915a \
<u>4. FKAU</u> 27			ANCON.
21	Does the Entity have policies in place addressing fraud risk?	Yes	Myle W
28	Does the Entity have a dedicated team responsible for		Alex On S
20	preventing & detecting fraud?	Yes	9/0 19
		1	
	TP-10-10-10-19 & doctorally fladd:		.20

129	Does the Entity have real time monitoring to detect fraud?	No
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
132	If appropriate, provide any additional information/context to the answers in this section.	N/A

Declaration Statement

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

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

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

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

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

I, 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 Institution.

I, JUAN CAMERON (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Welfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

Gerende de División Tesoreria

01/Apr/24 (Signature & Date)

Juan Cameron Juan

Firmado digitalmente por Juan Cameron

Cameron Fecha: 2024.04.01 11:24:53 -04'00'

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