## the Wolfsberg Group

Financ	al Instit	ution N	lame
Locatio	n (Cour	itry):	

HYPO TIROL BANK AG		,	 
Austria			 and all the east

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.

4	Question	Answer
I. ENTIT	Y & OWNERSHIP	是一个一个。
1	Full Legal Name	
	0.00.00 (0.00 Per Res 1900 Per 2000 Res)	
		Hypo Tirol Bank AG
2	Append a list of foreign branches which are covered by	
	this questionnaire	
		Hypo Tirol Bank AG, Branch Italy
3	Full Legal (Registered) Address	
	1200 005 A 750 A 150 A 150 A 150 A	
		Meranerstraße 8, 6020 Innsbruck (AT)
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	
		01.07.1998
6	Select type of ownership and append an ownership chart	
od .	if available	
E -	Publicly Traded (25% of shares publicly traded)	No.
6 a		No
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	į.
	HAK .	
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	Yes
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
	18 S	
	3	
	_ d	
8	Does the Entity, or any of its branches, operate under an	
T.	Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which	
oa		
	operate under an OBL	
	1	
	The state of the s	
9	Does the Bank have a Virtual Bank License or provide	
,		no
	services only through online channels?	
10	Name of primary financial regulator/supervisory authority	
	7 20 20 20 20 20	
	T.	I i
		Commission Financial Commission C
		Österreichische Finanzmarktaufsicht (FMA)
11	Provide Legal Entity Identifier (LEI) if available	
		POWER HAND WATER LOCATION
	D	0W5QHUNYV4W7GJ062R27
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	
	1	D waste
-		Land Tirol
	Jurisdiction of licensing authority and regulator of ultimate	
13		
13	parent	Austria
		Austria
14 14 a	Select the business areas applicable to the Entity Retail Banking	Austria Yes

44.	Commercial Banking	Yes
14 c		Yes
14 d	Transactional Banking	
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	Yes
14 i	Multilateral Development Bank	No
14 j	Wealth Management	Yes
14 k	Other (please explain)	
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are	No
15 a	orovided)  If Y, provide the top five countries where the non- resident customers are located.	
40	Colort the elegant value:	
16	Select the closest value:	201 E00
16 a	Number of employees	201-500
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	
2 PROD	UCTS & SERVICES	
19	Does the Entity offer the following products and services:	
19	Does the Entity offer the following products and services:	Yes
19 19 a	Does the Entity offer the following products and services:  Correspondent Banking	Yes
19	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking	Yes Yes
19 19 a 19 a1	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to	
19 a 19 a 19 a1 19 a1a	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with	Yes
19 a 19 a1 19 a1 19 a1a	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking	Yes No
19 a 19 a 19 a1 19 a1a 19 a1b	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships	Yes No Yes
19 a 19 a 1 19 a 1 a 19 a 1 a 1 b 1 9 a 1 c 1 9 a 1 d	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with	Yes No Yes
19 19 a 19 a1 19 a1a 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	Yes No Yes No No No No
19 a 19 a 19 a 1 19 a 1 a 1 b 1	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	Yes No Yes No No No No
19 a 19 a 1 19 a 1 a 1 b 19 a 1 c 19 a 1 d 19 a 1 d 19 a 1 d 19 a 1 f 19 a 1 g 19 a 1 h 19 a	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	Yes No Yes No No No No No
19 a 19 a 1 19 a 1 a 1 b 1 a 1 b 1 a 1 c 1 9 a 1 d 1 9 a 1 d 1 9 a 1 d 1 9 a 1 f 1 9 a 1 g 1 f 1 9 a 1 g 1 f 1 9 a 1 g 1 f 1 9 a 1 g 1 f 1 9 a 1 g 1 f 1 9 a 1 g 1 f 1 f 1 f 1 f 1 f 1 f 1 f 1 f 1 f	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	Yes No Yes No No No No

19 a1i 19 b 19 c 19 d	Does the Entity have processes and procedures in	
19 c 19 d 19 e		
19 c 19 d 19 e	place to identify downstream relationships with	No
19 c 19 d 19 e	MSBs /MVTSs/PSPs?	
19 c 19 d 19 e	Cross-Border Bulk Cash Delivery	No
19 d 19 e	Cross-Border Remittances	Yes
19 e	Domestic Bulk Cash Delivery	
		No .
	Hold Mail	No
19 f	International Cash Letter	No
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then	
	offer third party payment services to their customers?	No
19 i1	If Y , please select all that apply below?	
19 i2	Third Party Payment Service Providers	
19 i3	Virtual Asset Service Providers (VASPs)	
19 14	eCommerce Platforms	
19 i5	Other - Please explain	
19 j	Private Banking	Both
19 k	Remote Deposit Capture (RDC)	Yes
191	Sponsoring Private ATMs	No No
19 m	Stored Value Instruments	Yes
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
19 p	For each of the following please state whether you	
	offer the service to walk-in customers and if so, the	
	applicable level of due diligence;	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	Yes
	If yes, state the applicable level of due diligence	
19 p2a		
19 p3	Foreign currency conversion	Yes
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	Yes
19 p4a	If yes, state the applicable level of due diligence	
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	Our walk-in customery can have access of the services above only up to 1.000, EUR. Both initiatior and beneficiary are checked for PEP status and sanctions.
19 q	Other high-risk products and services identified by the Entity (please specify)	
	II.	
20	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches.	Yes
20 20 a		Yes
	are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to	Yes
20 a	are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.	Yes
20 a 21 3. AML, CT	are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.	Yes
20 a 21 3. AML, CT	are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  IF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
20 a 21 3. AML, CT 22	are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  IF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise	Yes
20 a 21 3. AML, CT	are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  IF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening	
20 a 21 3. AML, CT 22	are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  If SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise	Yes
20 a 21 3. AML, CT 22 22 a 22 b 22 c	are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  IF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership	Yes Yes Yes
20 a 21  3. AML, CT 22  22 a 22 b 22 c 22 d	are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  IF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting	Yes Yes Yes Yes
20 a  21  3. AML, CT  22  22 a  22 b  22 c  22 d  22 e	are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  IF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD	Yes Yes Yes Yes Yes Yes Yes
20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f	are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  IF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD	Yes Yes Yes Yes Yes Yes Yes Yes
20 a  21  3. AML, CT  22  22 a  22 b  22 c  22 d  22 e  22 f  22 g	are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  IF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing	Yes
20 a  21  3. AML, CT  22  22 a  22 b  22 c  22 d  22 e  22 f  22 g  22 h	are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  IF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  Independent Testing  Periodic Review	Yes
20 a  21  3. AML, CT  22  22 a  22 b  22 c  22 d  22 e  22 f  22 g  22 h  22 i	are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  IF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing  Periodic Review  Policies and Procedures	Yes
20 a  21  3. AML, CT  22  22 a  22 b  22 c  22 d  22 e  22 f  22 g  22 h	are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.	Yes
20 a  21  3. AML, CT  22  22 a  22 b  22 c  22 d  22 e  22 f  22 g  22 h  22 i	are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  IF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing  Periodic Review  Policies and Procedures	Yes

22 m	Suspicious Activity Reporting	Yes
22 n		Yes
22 o		Yes
23	Lleve many full time ampleyons are in the Entitle AMI	
23	CTF & Sanctions Compliance Department?	1-10
24	Is the Entity's AML, CTF & Sanctions policy approved at	
	least annually by the Board or equivalent Senior	
	Management Committee? If N, describe your practice in	Yes
	(A) 1 (A)	
	Question 29.  Does the Board receive, assess, and challenge regular	
25		Yes
	reporting on the status of the AML, CTF, & Sanctions	tes
	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	M
A-2-2	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.	
	and the brandwes that this applies to.	
	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
29	If appropriate, provide any additional information/context	
1000	to the answers in this section.	
4. ANTI B	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
(A.R.O)	consistent with applicable ABC regulations and	
	requirements to reasonably prevent, detect and report	Yes
	bribery and corruption?	
31	Does the Entity have an enterprise wide programme that	
	sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers	
32		Yes
	with sufficient experience/expertise responsible for	163
	coordinating the ABC programme?	
	D	
33	Does the Entity have adequate staff with appropriate	Man and a second a
33	levels of experience/expertise to implement the ABC	Yes
	levels of experience/expertise to implement the ABC programme?	
34	levels of experience/expertise to implement the ABC programme?  Is the Entity's ABC programme applicable to:	Yes  Both joint ventures and third parties acting on behalf of the Entity
	levels of experience/expertise to implement the ABC programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:	
34	levels of experience/expertise to implement the ABC programme?  Is the Entity's ABC programme applicable to:	
34 35	levels of experience/expertise to implement the ABC programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:	
34 35	levels of experience/expertise to implement the ABC programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This	
34 35	levels of experience/expertise to implement the ABC programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	Both joint ventures and third parties acting on behalf of the Entity
34 35	levels of experience/expertise to implement the ABC programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an	Both joint ventures and third parties acting on behalf of the Entity
34 35 35 a	levels of experience/expertise to implement the ABC programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Both joint ventures and third parties acting on behalf of the Entity  Yes
34 35	levels of experience/expertise to implement the ABC programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.  Includes enhanced requirements regarding interaction	Both joint ventures and third parties acting on behalf of the Entity
34 35 35 a	levels of experience/expertise to implement the ABC programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.  Includes enhanced requirements regarding interaction with public officials?	Both joint ventures and third parties acting on behalf of the Entity  Yes
34 35 35 a	levels of experience/expertise to implement the ABC programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books	Both joint ventures and third parties acting on behalf of the Entity  Yes
34 35 35 a	levels of experience/expertise to implement the ABC programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any	Both joint ventures and third parties acting on behalf of the Entity  Yes
34 35 35 a	levels of experience/expertise to implement the ABC programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books	Both joint ventures and third parties acting on behalf of the Entity  Yes  Yes
34 35 35 a	levels of experience/expertise to implement the ABC programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any	Both joint ventures and third parties acting on behalf of the Entity  Yes  Yes
34 35 35 a	levels of experience/expertise to implement the ABC programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any	Post joint ventures and third parties acting on behalf of the Entity  Yes  Yes
34 35 35 a 35 b	levels of experience/expertise to implement the ABC programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperty intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Both joint ventures and third parties acting on behalf of the Entity  Yes  Yes
34 35 35 a 35 b 35 c	levels of experience/expertise to implement the ABC programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Both joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes
34 35 35 a 35 b	levels of experience/expertise to implement the ABC programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular	Post joint ventures and third parties acting on behalf of the Entity  Yes  Yes
34 35 35 a 35 b 35 c	levels of experience/expertise to implement the ABC programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Both joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes
34 35 35 a 35 b 35 c	levels of experience/expertise to implement the ABC programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment	Both joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes
34 35 35 a 35 b 35 c	levels of experience/expertise to implement the ABC programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Both joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes
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34 35 35 35 a 35 b 35 c 36 37 38 38 39 40 40 a 40 b	levels of experience/expertise to implement the ABC programme?  Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  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 that involve state-owned or state-controlled entities or public officials	Both joint ventures and third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye

40 e	Changes in business activities that may materially	Yes
	increase the Entity's corruption risk	163
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities	Tes
10000	subject to ABC risk have been outsourced	Not Applicable
42 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	No
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
5. AML, 0 46	CTF & SANCTIONS POLICIES & PROCEDURES  Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent,	
	detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least annualty?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	Yes
48 a1	If Y, does the Entity retain a record of the results?	
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	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 c	Prohibit dealing with other entities that provide	Yes
40.4	banking services to unlicensed banks	0.00
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes

49 i	Define the process for escalating financial crime risk	
\$5.22	issues/potentially suspicious activity identified by	Yes
	employees	
49 j	Define the process, where appropriate, for terminating	
43,	existing customer relationships due to financial crime	Yes
		1,00
40.1	risk  Define the process for exiting clients for financial	
49 k		W
	crime reasons that applies across the entity, including	Yes
	foreign branches and affiliates	
491	Define the process and controls to identify and handle	
	customers that were previously exited for financial	Yes
	crime reasons if they seek to re-establish a	163
	relationship	
49 m	Outline the processes regarding screening for	
	sanctions, PEPs and Adverse Media/Negative News	Yes
	- 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1	
49 n	Outline the processes for the maintenance of internal	Yes
	"watchlists"	A CONTRACTOR OF THE CONTRACTOR
50	Has the Entity defined a risk tolerance statement or	
	similar document which defines a risk boundary around	Yes
	their business?	
51	Does the Entity have record retention procedures that	Yes
	comply with applicable laws?	res
51 a	If Y, what is the retention period?	
35515765		
		5 years or more
52	Confirm that all responses provided in the above Section	Mars.
(1 <del>11111</del> )	are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to	
32 a		
	and the branch/es that this applies to.	
		1
-	If appropriate, provide any additional information/context	
E2		
53		4
53	to the answers in this section.	
53		
53		
	to the answers in this section.	
6. AML, 0	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT	THE STATE OF THE S
	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent	10年,17年,2月7日至17年,18年日1日至17年, 中央中国建筑建筑,前面17年17年,17年间的18年17年,17年间,17年间,17年间,17年间,17年间,17年间,17年间,
6. AML, 0	to the answers in this section.  ITF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	1000年,1000年100日,1000年10日至10日,1000年1月日本第二日本日本日本日本日本日本日本日本日本日本日本日本日本日本日本日本日本日本
6. AML, 0	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent	Yes
6. AML, C	to the answers in this section.  ITF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Yes Yes
6. AML, 0 54 54 a 54 b	to the answers in this section.  CTF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product	Yes
6. AML, C 54 54 a 54 b 54 c	to the answers in this section.  CTF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel	Yes Yes
6. AML, C 54 54 a 54 b 54 c	to the answers in this section.  ITF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography	Yes
6. AML, C 54 54 a 54 b 54 c	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls	Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55	to the answers in this section.  CTF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a	to the answers in this section.  CTF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring	Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a	to the answers in this section.  ITF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence	Yes Yes Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a	to the answers in this section.  CTF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring	Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c	to the answers in this section.  ITF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence	Yes Yes Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 5 55 a 55 b 55 c 55 d	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c	to the answers in this section.  CIF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative	Yes Yes Yes Yes Yes Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 c 55 d 55 a 55 b 55 c 55 d 55 c	to the answers in this section.  CTF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News	Yes
6. AML, C 54 54 a 54 b 54 b 55 d 55 d 55 a 55 c 55 d 55 c	to the answers in this section.  ITF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News  Training and Education	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes
6: AML, C 54  54 a 64 b 54 c 54 d 55 a 55 c 55 d 55 c 55 d 55 c 55 d	to the answers in this section.  CTF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	Yes
6: AML, C 54 54 a 54 b 54 c 55 d 55 c 55 a 55 c 55 d 55 c 55 d 55 c	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes
6: AML, C 54  54 a 64 b 54 c 54 d 55 a 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h	to the answers in this section.  CTF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News  Training and Education  Governance  Management Information  Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
6. AML, C 54 54 a 54 b 54 c 54 c 55 c 55 a 55 c 55 d 55 c 55 d 55 c 55 d 55 6	to the answers in this section.  CTF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News  Training and Education  Governance  Management Information  Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
6: AML, C 54  54 a 64 b 54 c 54 d 55 a 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
6. AML, C 54 54 a 54 b 54 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c	to the answers in this section.  CTF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News  Training and Education  Governance  Management Information  Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
6. AML, C 54 54 a 54 b 54 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
6. AML, C 54 54 a 54 b 54 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c	to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
6. AML, C 54 54 a 54 b 55 c 55 c 55 c 55 d 55	to the answers in this section.  CTF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News  Training and Education  Governance  Management Information  Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.	Yes
6. AML, C 54 54 a 54 b 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c	to the answers in this section.  CTF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News  Training and Education  Governance  Management Information  Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.	Yes
6. AML, C 54 54 a 54 b 54 c 554 d 555 c 55 d 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	to the answers in this section.  CTF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News  Training and Education  Governance  Management Information  Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
6. AML, C 54 a 54 a 54 b 55 c 55 c 55 d 55 d 55 c 55 d 55 c 55 d 55 d 56 d 5	to the answers in this section.  CIF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News  Training and Education  Governance  Management Information  Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:  Client	Yes
6. AML, C 54 54 a 54 b 55 c 55 c 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 f 55 a 57 b 57 a 57 b	to the answers in this section.  CTF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News  Training and Education  Governance  Management Information  Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:  Client  Product	Yes
6. AML, C 54 54 a 54 b 554 d 555 55 a 555 b 55 c 55 d 55 c 55 d 55 a 55 f 55 g 55 h 56 56 a	to the answers in this section.  CTF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News  Training and Education  Governance  Management Information  Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:  Client  Product  Channel	Yes
6. AML, C 54 54 a 54 b 554 c 555 a 555 c 555 d 555 c 556 d 55 6 55 6 55 7 55 7 57 a 57 b 57 c 57 d	to the answers in this section.  CTF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News  Training and Education  Governance  Management Information  Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography	Yes
6. AML, C 54 54 a 54 b 554 d 555 55 a 555 b 55 c 55 d 55 c 55 d 55 6 55 a 55 7 55 7 57 a 57 b 57 c	to the answers in this section.  CIF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	Yes
6. AML, C 54 54 a 54 b 554 c 55 c 55 a 555 c 55 d 55 c 55 d 55 c 55 d 55 a 55 f 55 g 55 h 56 57 a 57 a 57 a 57 d	to the answers in this section.  CTF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News  Training and Education  Governance  Management Information  Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
6. AML, C 54 54 a 54 b 554 c 55 c 55 a 555 c 55 d 55 c 55 d 55 c 55 d 55 a 55 f 55 g 55 h 56 57 a 57 a 57 a 57 d	to the answers in this section.  CIF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	Yes
6. AML, C 54 54 a 54 b 55 c 55 d 55 d	to the answers in this section.  ITF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News  Training and Education  Governance  Management Information  Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:  Customer Due Diligence	Yes
6. AML, C 54 54 a 54 b 55 c 55 a 55 b 55 c 55 d 55 c 55 d 55 a 55 f 55 a 55 f 55 g 55 h 56 57 a 57 a 57 b 57 c 57 d 58 58 a 58 b	to the answers in this section.  CTF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes
6. AML, C 54 54 a 54 b 54 c 54 c 55 c 55 d 55 d	to the answers in this section.  ITF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News  Training and Education  Governance  Management Information  Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:  Customer Due Diligence	Yes

	Nama Camarina	No.
58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA	
59 a	was completed.	.5.
	was completed.	
60	Confirm that all responses provided in the above Section	Yes
<u></u>	are representative of all the LE's branches  If N, clarify which questions the difference/s relate to	200
60 a	and the branch/es that this applies to.	
	and the branches that this applies to.	
61	If appropriate, provide any additional information/context	
	to the answers in this section.	
7 KYC C	DD and EDD	THE RESIDENCE OF THE CONTROL OF THE PROJECT OF THE
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	765
- T	CDD must be completed, e.g. at the time of onboarding	Yes
	or within 30 days?	
64	Which of the following does the Entity gather and retain	
	when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	25%
67	Does the due diligence process result in customers	
01	receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the	
	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	
	PARK SZEP	
68	For high risk non-individual customers, is a site visit a part	V
<u> </u>	of your KYC process?	res
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4	Other	
68 a4a	If yes, please specify "Other"	
	15 M2N \$1 M	
69	Does the Entity have a risk based approach to screening	
33	customers for Adverse Media/Negative News?	Yes
	sessiming for naveled incularitegative items;	
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

CO -2	Trigger avent	Yes
59 a3 70	Trigger event What is the method used by the Entity to screen for	
U	Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
/1 a	If Y, is this at:	
1 a1	Onboarding	Yes
1 a2	KYC renewal	Yes
1 a3	Trigger event	Yes
2	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening	
	customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	No
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	Yes
74 a4 74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	163
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Prohibited
76 b	Respondent Banks	EDD on risk-based approach
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	EDD on risk-based approach
76 e	Gambling customers	Prohibited
	General Trading Companies	Do not have this category of customer or industry
76 1		
76 g	Marijuana-related Entities	EDD on risk-based approach
76 h	MSB/MVTS customers	Prohibited
76 i	Non-account customers	Do not have this category of customer or industry
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	EDD on risk-based approach
761	Nuclear power	Prohibited
76 m	Payment Service Providers	Prohibited
76 n	PEPs	EDD on risk-based approach
76 o	PEP Close Associates	EDD on risk-based approach
	PEP Related	EDD on risk-based approach
76 p	Precious metals and stones	EDD on risk-based approach
76 q		
76 r	Red light businesses/Adult entertainment	Prohibited
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v	Unregulated charities	EDD on risk-based approach
76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers	EDD on risk-based approach
76 y	Other (specify)	
77	If restricted, provide details of the restriction	Prequisite is an Address in Austria and comparable standards and requirements as for correspondent bank
		relationship. The bank account can be opened solely with the explicit agreement of the AML Officer, in some cases it is also necessary the agreement of the Managing Board.

178 a			
entities that handed client money such as lawyers, accountable, consultants, created and support of the support	78 a	If Y indicate who provides the approval:	
accountants, consultants, real estate agents?  Does the Entity perform an additional control or quality review on clients subject to EDD?  In more control or the Entity perform to the subject to the control of the co	79	Does the Entity have specific procedures for onboarding	
accountants, consultants, real estate agents?  Does the Entity perform an additional control or quality review on clients subject to EDD?  In more control or the Entity perform to the subject to the control of the co		entities that handle client money such as lawyers.	Yes
80 Does the Entity perform an additional control or quality review on clients subject to BDD? 81 acromomentative of all the Espanyase provided in the above Section on another control to the control of			
review on clients subject to EDD?  Ocorfirm that all response provided in the above Section on the processes provide of the but £2 branches  If a limit the provide any additional information/context to the answers in this species to the answers in this species to the answers in this species.  B. MONITORING & REPORTING  B. MONITORING & REPORTING  B. MONITORING & REPORTING  B. MONITORING & REPORTING  B. What is the method used by the Entity to monitor transactions for suspicious activities?  B. What is the method used by the Entity to monitor transactions are monitored manually of transaction of transaction monitoring of the manual of the ma	80	The state of the s	
81 a continued or combination selected, or enternal system or combination selected, specify what type of instructions for extreme the selection of the combination selected, specify what type of instructions for extreme the selection of the combination selected, what is the manual or instruction and the various selected, specify what type of instructions or oribination selected, specify what type of instructions or instructions are under selected, what is the manual or instruction and reporting or instructions are under selected, specify what type of instructions are under selected, what is the name of the vendor/loan?  84 bit If vendor-searced for or Both selected, what is the name of the vendor/loan?  85 bit Selected in the selected of the Both selected, what is the name of the vendor/loan?  86 bit When was the adomated Transaction Monitoring and selected or the selected	00		Yes
### Standard Company of the Life's branches   Yes    ### Standard Company and Standard Compan			
See Proceedings of the Care Standards   See Proceedings	01		Yes
### Appropriate, provide any additional information/context to the answers in this section.  ### AMONITORING & REPORTING  ### AMONITORING & REPORTING & REP			
### ### ### ### ### ### ### ### ### ##	81 a		
S. MONITORING & REPORTING		and the branch/es that this applies to	
S. MONITORING & REPORTING			
S. MONITORING & REPORTING		312	
S. MONITORING & REPORTING			
S. MONITORING & REPORTING	82		li .
Does the Entity have risk based policies, procedures and monitoring processes to the identification and reporting of suspicious activity?  44 What is the method used by the Entity to monitor transactions for suspicious activities?  45 If manual or combination selected, specify what type of transactions for suspicious activities?  46 If manual or combination selected, are internal system or vendor-sourced tools used?  46 If which is the manual or submitted tools used?  47 If vendor-sourced tool or Bolts selected, what is the name of the vendor/hoo?  48 b2 When was the tool last updated?  48 b3 When was the automated Transaction Monitoring application last calibrated?  48 b2 When was the automated Transaction Monitoring application last calibrated?  48 b3 Obes the Entity have regulatory requirements to report submitted in the processes to comply with suspicious transactions?  49 b2 If v. does the Entity have policies, procedures and processes to manually management reporting of customer transactions and activity?  40 b2 b3 b3 Figure 1 b3 b3 Figure 1 b3 b3 b4 b4 b5 b4 b5 b5 b5 b6		to the answers in this section.	
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Transparency Standards?	92		Yes
		Transparency Standards?	1

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure	
93 a	compliance with: FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	EU-Geldtransfer Verordnung
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC	TIONS (NUMBER 1997) CONTROL OF THE PROPERTY OF	The second secon
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Both Automated and Manual
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Both
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Targens and Dow Jones
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Combination of automated and manual
105	Does the Entity have a data quality management programme to ensure that complete data for all	Yes
106	transactions are subject to sanctions screening?  Select the Sanctions Lists used by the Entity in its	
106 a	sanctions screening processes: Consolidated United Nations Security Council	
106 b	Sanctions List (UN) United States Department of the Treasury's Office of	Used for screening customers and beneficial owners and for filtering transactional data
106 C	Foreign Assets Control (OFAC)  Office of Financial Sanctions Implementation HMT	Used for screening customers and beneficial owners and for filtering transactional data
100 0	(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)	estation of the second of the		
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			
107 a	systems against: Customer Data	Same day to 2 business days		
107 b	Transactions	Same day to 2 business days		
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?			
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.			
11. TRAIN	ING & EDUCATION  Does the Entity provide mandatory training, which	TO TEXT SHAPES TO COMPANY THE COMPANY AND COMPANY OF THE COMPANY O		
53555 	includes:			
111 a	Identification and reporting of transactions to government authorities	Yes		
111 Ь	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes		
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes		
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes		
111 e	Conduct and Culture	Yes		
111 f	Fraud	Yes		
112	Is the above mandatory training provided to :			
112 a	Board and Senior Committee Management	Yes		
112 b	1st Line of Defence	Yes		
112 c	2nd Line of Defence	Yes		
112 d	3rd Line of Defence	Yes		
112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable		
112 f	Non-employed workers (contractors/consultants)	Not Applicable		
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes		
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes		
114 a	If Y, how frequently is training delivered?	Annually		
1144				

all N. Carley which questions the difference's failed to all the branches half the applies to.  If a groupoptale, provide any additional information/cordext to the antiwors in this socion.  If a groupoptale, provide any additional information to the socion of the instead of the provided and the facility of the socion of the instead of			
to the answers in this section.    117	115 a		
to the answers in this section.    117			
Assurance programms for financial crinic reported from the control of the control	116		
Assurance programms for financial crinic reported from the control of the control	40 OHALD	DY ASSURANCE ISOMOLIANCE TESTING	The state of the s
Assurance programme for financial crime (separate from the interpretended And function)  The interpretended And function of the based visit of the properties of the propertie			1 1911年 - 1920日本の大学を対します。本年の中国では800年 日本中央学院の大学研究教育機会では1927年 日本の代表の中学研究の研究を持ちませた。 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
118 Does the Enally have a program work risk based Complance Testing process (separate from the independent Audit Encland) 119 are representative of all the LES branches 119 a.  If N, Cardy which questions the difference/a relate to an other branches that applies to to the answers in this section.  120 If appropriate, provide any additional information/context to the answers in this section.  13. AUDIT 121 In addition to inspections by the government superior and the formation of the answers in this section.  13. AUDIT 122 In addition to inspections by the government superior and the formation of the inspection of th	117	Assurance programme for financial crime (separate from	Yes
independent Austif function?  119 Confirm that all responses provided in the above Section are expresentative of all the LE's branches 119 a If A, Calify which questions the offerencios relate to end the trenches that this appeals to.  120 If appropriate, provide any additional information/context to the answers in this section.  121 In addition to inspections by the government supervison/regulators, does the Entity have an internal audit function, a lesting inchican or other function or other independent function or other	118	Does the Entity have a program wide risk based	
are representative of all the LE's branches   193		independent Audit function)?	Yes
and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  It appropriate, provide any additional information/context to the answers in this section.  It addition to inspections by the government superviscon/regulators, does the Entity have an infernal audit function, a testing function or other independent superviscon/regulators, does the Entity have an infernal audit function, a testing function or other independent plant basis?  It also be a section policies and practices on a regular basis?  It also be a section policies and practices on a regular basis?  It also be a section policies and practices on a regular basis?  It also be a section policies and practices on a regular basis?  It also be a section policies and practices on a regular basis?  It also be a section policies and practices on a regular basis?  It also be a section policies and practices on a regular basis?  It also be a section policies and practices on a regular basis?  It also be a section policies and practices on a regular basis?  It also be a section policies and practices on a regular basis?  It also be a section policies and practices on a regular basis and a section and the banches that this applies to an other basis and the banches and t	119		Yes
to the answers in this section.  121 In addition to inspections by the government 221 superiors/regulation, does the Entity have an internal audit function, a testing function or other independent third party, or both, flatt assesses FCc AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?  122 In a formal party of the property addition of the following: 123 In a formal party of the party addition of the following: 124 Internal Audit Department 125 Estemal Third Party 125 Estemal Third Party 126 Estemal Third Party 127 Internal Audit Department 128 Internal Audit Department 128 Internal Audit Department 129 Open the internal audit function or other independent third party cover the following areas: 129 Open the internal audit function or other independent third party cover the following areas: 120 Open the internal audit function or other independent third party cover the following areas: 123 Open the internal audit function or other independent third party cover the following areas: 123 Open the internal audit function or other independent third party cover the following areas: 123 Open the following areas: 124 Open the following areas: 125 Open the following areas: 126 Open the following areas: 127 Open the following areas: 128 Open the following areas: 129 Open the following areas: 120 Open the following areas: 120 Open the following areas: 121 Open the following areas: 122 Open the following areas: 123 Open the following areas: 124 Are adverse findings from internal & external audit 125 Open the following areas: 126 Open the following areas: 127 Open the Entity have policies in place addressing frout 128 Open the Entity have a additional information/context 128 Open the Entity have a additional information/context 128 Open the Entity have a additional information for the following and and answers in this section.	119 a		2
supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?  122 How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: 122 Internal Audit Department Yearly 123 Internal Audit Department Yearly 123 Does the internal audit function or other independent third party cover the following areas: 123 a procedures of the Control of the Audit Audit Company of the A	120		
supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?  122 How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: 122 Internal Audit Department Yearly 123 Internal Audit Department Yearly 123 Does the internal audit function or other independent third party cover the following areas: 123 a procedures of the Control of the Audit Audit Company of the A	13 ALIDIT	COMMON CONTRACTOR OF COMMON CO	
supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?  122 How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:  123 Internal Audit Department  124 Internal Audit Department  125 External Third Party  127 Yearly  128 External Third Party  129 Yearly  129 External Third Party  120 Yearly  121 AML, CTF, ABC, Fraud and Sanctions policy and procedures  120 Destine Internal Audit General or other independent third party cover the following areas:  125 Description of the Internal Audit General Order of the Internal Order of		In addition to inspections by the government	
How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:  122 a Internal Audit Department 123 b External Third Party 124 Catenal Third Party 125 Does the internal audit function or other independent third part over the following areas: 126 a Race, Fraud and Sanctions policy and procedures and Sanctions and San	121	supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular	Yes
External Third Party   Yearhy	122	How often is the Entity audited on its AML, CTF, ABC,	Springer Springer Committee Committe
122 b   External Third Party   Yearh	122 a	Internal Audit Department	Yearly
Does the internal audif function or other independent third party cover the following areas:    23 a			
party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Ves Care Governance Ves Car			
procedures Priss Price Mark Assessment Pes	200 E	party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and	W.
123 c Governance Yes  123 d KYC/CDDED 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 l Transaction Monitoring Yes  123 l Transaction Monitoring Yes  123 l Transaction Screening including for sanctions Yes  124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  125 Confirm that all responses provided in the above section are representative of all the LE's branches  126 If N, clarity which questions the difference/s relate to and the branch/es that this applies to.  127 If appropriate, provide any additional information/context to the answers in this section.  128 Does the Entity have policies in place addressing fraud nisk?  129 Does the Entity have a dedicated team responsible for Yes  129 Does the Entity have a dedicated team responsible for Yes	SAMPLE SERVICES	procedures	
123 d KYC/CDMEDD 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 l Transaction Monitoring Yes 123 l Transaction Monitoring Yes 123 l Transaction Screening including for sanctions Yes 123 l Transaction Screening including for sanctions Yes 123 l Other (specify)  124 Are adverse findings from internal & external audit tracked to completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's brandons the difference's relate to and the branch/es that this applies to.  125 If appropriate, provide any additional information/context to the answers in this section.  126 Does the Entity have policies in place addressing fraud risk? 127 Does the Entity have a dedicated team responsible for Yes 128 Does the Entity have a dedicated team responsible for Yes 128 Does the Entity have a dedicated team responsible for Yes	123 b	Enterprise Wide Risk Assessment	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 h Transaction Monitoring   Yes     123 j Transaction Screening including for sanctions   Yes     123 k Training & Education   Yes     123 k Training & Education   Yes     123 l Other (specify)	123 c		Yes
Reporting/Metrics & Management Information   Yes     123 g	123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 g Suspicious Activity Filing Yes 123 h Technology Yes 123 l Transaction Monitoring Yes 123 l Transaction Screening including for sanctions Yes 123 l Transaction Screening including for sanctions Yes 123 l Training & Education Yes 123 l Other (specify)  124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  14. FRAUD 127 Does the Entity have policies in place addressing fraud fisk? 128 Does the Entity have a dedicated team responsible for	123 e		Yes
123 h Technology Yes 123 I Transaction Monitoring Yes 123 I Transaction Screening including for sanctions Yes 123 k Training & Education Yes 123 l Other (specify)  124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible for Yes	123 f	Reporting/Metrics & Management Information	
123 I Transaction Monitoring Yes 123 J Transaction Screening including for sanctions Yes 123 K Training & Education Yes 123 I Other (specify)  124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completioness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible for	123 g	Suspicious Activity Filing	Yes
123   Transaction Screening including for sanctions   Yes   123 k   Training & Education   Yes   123 l   Other (specify)    124   Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  125   Confirm that all responses provided in the above section are representative of all the LE's branches   125 a   If N, Cainfy which questions the difference/s relate to and the branch/es that this applies to.  126   If appropriate, provide any additional information/context to the answers in this section.  127   Does the Entity have policies in place addressing fraud risk?  128   Does the Entity have a dedicated team responsible for   129   Does the Entity have a dedicated team responsible for   120   Yes   121   Yes   122   Yes   123   Yes   124   Practical Section   125   Practical Section   126   Practical Section   127   Practical Section   128   Practical Section   129   Practical Section   120   Practical Section   120   Practical Section   120   Practical Section   121   Practical Section   122   Practical Section   123   Practical Section   124   Practical Section   125   Practical Section   126   Practical Section   127   Practical Section   128   Practical Section   129   Practical Section   120   Practical Section   120   Practical Section   120   Practical Section   120   Practical Section   121   Practical Section   122   Practical Section   123   Practical Section   124   Practical Section   125   Practical Section   126   Practical Section   127   Practical Section   128   Practical Section   129   Practical Section   120   Practical Section   120   Practical Section   120   Practical Section   120   Practical Section   121   Practical Section   126   Practical Section   127   Practical Section   128   Practical Section   129   Practical Section   120   Practical Section   120   Practical Section   120   Practical Section   121   Practical Section   122   Practical Section   123   Practical Section   124   Practical Section   125   Practical Sectio	123 h	Technology	Yes
123 k Training & Education Yes  123 l Other (specify)  124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  125 Confirm that all responses provided in the above section are representative of all the LE's branches  125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible for Yes	123 i	Transaction Monitoring	Yes
124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  125 Confirm that all responses provided in the above section are representative of all the LE's branches  125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible for	123 j	Transaction Screening including for sanctions	Yes
Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  125 Confirm that all responses provided in the above section are representative of all the LE's branches  125 If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  14. FRAUD  127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible for yes	123 k	Training & Education	Yes
tracked to completion and assessed for adequacy and completeness?  125 Confirm that all responses provided in the above section are representative of all the LE's branches  125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  14. FRAUD  127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible for	123 I	Other (specify)	
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If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  Id. FRAUD  Does the Entity have policies in place addressing fraud risk?  Does the Entity have a dedicated team responsible for yes	125	Confirm that all responses provided in the above section	Yes
to the answers in this section.  14. FRAUD  127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible for yes	125 a	If N, clarify which questions the difference/s relate to	
127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible for Yes	126		
127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible for Yes	14. FRAL	Deducation	
128 Does the Entity have a dedicated team responsible for Yes		Does the Entity have policies in place addressing fraud	Yes
	128		Yes

129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	

## 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)

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

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

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

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

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

MAG. SUSANNE ENDL MAG. WSANNE ENDL (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers rovided 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.

MAG. BENEGETTA QUALATO (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 Lam authorised to execute this declaration on behalf of the Financial Institution.

(Signature & Date) 20.04.2023

(Signature & Date) 20.04.2023