the Wolfsberg Group

Financial Institution Name: Location (Country) :

HYPO TIROL BANK AG AUSTRIA

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

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	
		HYPO TIROL BANK AG
2	Append a list of foreign branches which are covered by	
2	this questionnaire	
	tins questionnaire	HYPO TIROL BANK AG
		Italy Branch
3	Full Legal (Registered) Address	
		Marsager Street a. R. AT 6020 Jacobs jelv
		Meraner Straße 8, AT 6020 Innsbruck
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	
-		
		01.07.1998
•	Coloot time of oursesting and annual and annual and annual and annual and annual and annual a	
6	Select type of ownership and append an ownership chart	
•	if available	N-
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	Yes
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
		l
		0%
8	Does the Entity, or any of its branches, operate under an	
•	Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which	
	operate under an OBL	
	S. • Contract to Contract to the Contract to t	
9	Does the Bank have a Virtual Bank License or provide	
	services only through online channels?	no
10	Name of primary financial regulator/supervisory authority	
5 T		
		Österreichische Finanzmarktaufsicht (FMA)
44	Descride Legal Entity Identifica (LED 16 2-1)	
11	Provide Legal Entity Identifier (LEI) if available	
		0W5QHUNYV4W7GJO62R27
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	Land Tirol
		(Federeal state of Tyrol)
13	Jurisdiction of licensing authority and regulator of ultimate	
	parent	
		Austria
	Calcat the business	
14	Select the business areas applicable to the Entity	V
14 a	Retail Banking	Yes
14 b	Private Banking	Yes

14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	Yes
14 i	Multilateral Development Bank	No
14 j	Wealth Management	Yes
14 k	Other (please explain)	
		None
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	No
15 a	If Y, provide the top five countries where the non- resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	201-500
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section	Greater than \$500 million
17	are representative of all the LE's branches.	No
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Italy branch doesn't provide any new products/services.
18	If appropriate, provide any additional information/context to the answers in this section.	
	to the answers in this section.	
2. PROD	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services:	
2. PROD 19	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking	Yes
2. PROD 19 19 a 19 a1	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y	Yes
2. PROD 19	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking	Yes Yes
2. PROD 19 19 a 19 a1	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to	
2. PROD 19 19 a 19 a 19 a1 19 a1a	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with	Yes
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2. PROD 19 19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes No Yes No
2. PROD 19 19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks?	Yes No Yes
2. PROD 19 19 a 19 a 19 a 19 a 19 a 19 a 10	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships	Yes No Yes No
2. PROD 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f 19 a1f	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity fore Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	Yes No Yes No No No No
2. PROD 19 19 a 19 a 19 a1 19 a1a 19 a1c 19 a1d 19 a1d 19 a1d 19 a1f	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	Yes No Yes No No No No
2. PROD 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f 19 a1f	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	Yes No Yes No No No No No
2. PROD 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f 19 a1f 19 a1f	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	Yes No Yes No No No No

19 a1i 19 b 19 c 19 d 19 e 19 f 19 g 19 h 19 i 19 i1 19 i2	MSBs /MVTSs/PSPs? Cross-Border Bulk Cash Delivery Cross-Border Remittances Domestic Bulk Cash Delivery Hold Mail	No No Yes No No No No No No No No
19 b 19 c 19 d 19 e 19 f 19 g 19 h 19 i	place to identify downstream relationships with MSBs /MVTSs/PSPs? Cross-Border Bulk Cash Delivery Cross-Border Remittances Domestic Bulk Cash Delivery Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then	No Yes No No No No
19 c 19 d 19 e 19 f 19 g 19 h 19 i	MSBs /MVTSs/PSPs? Cross-Border Bulk Cash Delivery Cross-Border Remittances Domestic Bulk Cash Delivery Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then	No Yes No No No No
19 c 19 d 19 e 19 f 19 g 19 h 19 i	Cross-Border Bulk Cash Delivery Cross-Border Remittances Domestic Bulk Cash Delivery Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then	Yes No No No No No
19 c 19 d 19 e 19 f 19 g 19 h 19 i	Cross-Border Remittances Domestic Bulk Cash Delivery Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then	Yes No No No No No
19 d 19 e 19 f 19 g 19 h 19 i	Domestic Bulk Cash Delivery Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then	No No No No
19 e 19 f 19 g 19 h 19 i	Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then	No No No
19 f 19 g 19 h 19 i	International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then	No No
19 g 19 h 19 i	Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then	No
19 h 19 i	Payable Through Accounts Payment services to non-bank entities who may then	
19 h 19 i	Payment services to non-bank entities who may then	No
19 i 19 i1	Payment services to non-bank entities who may then	
19 i1		
	į	No
	If V places select all that apply helau?	
19 12	If Y , please select all that apply below?	No.
	Third Party Payment Service Providers	No
19 i3	Virtual Asset Service Providers (VASPs)	No
19 i4	eCommerce Platforms	No
19 i5	Other - Please explain	
19 j	Private Banking	Both
19 k	Remote Deposit Capture (RDC)	No
19		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
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	Yes
19 p3a	If yes, state the applicable level of due diligence	Due Diligence
19 p4	Sale of Monetary Instruments	Yes
19 p4a	If yes, state the applicable level of due diligence	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 services are offered to walk-in-customers only up to EUR 1.000,00. Initiator an beneficiary are both checked for PEP-status and sanctions.
19 q	Other high-risk products and services identified by the Entity (please specify)	None
	Confirm that all responses provided in the above Section are representative of all the LE's branches.	No
20 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	Italy branch doesn't provide any new products/services.
	If appropriate, provide any additional information/context to the answers in this section.	
	F & SANCTIONS PROGRAMME	
	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
	rollowing components:	
	Appointed Officer with sufficient experience/expertise	Yes
		Yes Yes
22 a 22 b	Appointed Officer with sufficient experience/expertise Adverse Information Screening	Yes
22 a 22 b 22 c	Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership	Yes Yes
22 a 22 b 22 c 22 d	Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting	Yes Yes Yes
22 a 22 b 22 c 22 d 22 e	Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD	Yes Yes Yes Yes Yes
22 a 22 b 22 c 22 d 22 e 22 f	Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	Yes Yes Yes Yes Yes Yes
22 a 22 b 22 c 22 d 22 e 22 f 22 g	Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Yes Yes Yes Yes Yes Yes Yes Yes
22 a 22 b 22 c 22 d 22 e 22 f	Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Yes Yes Yes Yes Yes Yes
22 a 22 b 22 c 22 d 22 e 22 f 22 g	Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Yes Yes Yes Yes Yes Yes Yes Yes
22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i	Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes
22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes Yes Yes Yes Yes Yes Yes Yes Yes

22 n. Transaction Montatoring 22 n. Transaction Montatoring 23 n. Transaction Montatoring 24 c. Transaction Montatoring 25 c. Transaction Montatoring 26 c. Transaction Montatoring 27 c. Transaction Montatoring 28 list the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29. 26 Does the Entity are first parties to carry out any components of its AML, CTF & Sanctions programme? 27 Does the entity have an whistleblower policy? 28 Confirm that all responses provided in the above Section are representative of all the LE's branches 29 If your provide ray additional information/content to the answers in this section. 29 If appropriate, provide any additional information/content to the answers in this section. 29 If appropriate, provide any additional information/content to the answers in this section. 29 If appropriate, provide any additional information/content to the answers in this section. 20 None 4. ANT BRIBERY & CORRUPTION 20 In the Entity forcumental policies and procedures consistent with applicable ABC regulations and equivaments to reasonably prevent, detect and report britten and consistent with applicable ABC regulations and equivaments to reasonably prevent, detect and report britten and consistent with applicable ABC regulations and societies with sufficient experience/peptrister seponshelfor with the ABC programme? 30 Does the Entity have a global ABC policy that: 4 See The Entity appointed a designated officer or officers with sufficient experience/peptrister seponshelfor consistent with applicable for confidence in the ABC programme applicable to confidence in the ABC programme? 31 Does the Entity have a global ABC policy that: 4 See The Entity ABC policy that: 4 See The Entity ABC policy that: 5 C. Includes a prohibibility private action or octain an improperly intended to influence action or octain an improperly intended to influence action or octain an improperly intended to i	m I Sile	i-i A-4i-it- Dti	V
22 International Monitoring		spicious Activity Reporting	Yes
How many full time employees are in the Entity's ANU. CTF. & Sanctions Compliance Department?			
2 is the Entity's AML. CIT is Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee' If it. Assenbe your practice in Ougstain 29. 25			Yes
Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Serior Management Committee? If N, describe your practice in Question 29.			1-10
least annually by the Board or equivalent Senior Management Committee? I'N. describe your practice in Question 29. Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF. & Sanctions programme? Does the Entity have a whistleblower policy? Confirm that all responses provided in the above Section are representative of all the LES branches 8 a If Y, provide further details 27 Does the entity have a whistleblower policy? 28 Confirm that all responses provided in the above Section are representative of all the LES branches 8 a If appropriate, provide any additional information/context to the answers in this section. None 4. ANTI BRIBERY & CORRUPTION 30 Has the Entity documented policies and procedures consistent with splicitude ABC regulations and objects of the section of the			
Management Committee? If N., describe your practice in Question 29. Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF. & Sanctions programme? Does the Entity use third parties to carry out any components of its AML, CTF. & Sanctions programme? If Y, provide further details To Does the entity have a whistleblower policy? Does the entity have a whistleblower policy? To Does the entity have a policional information/context to the answers in this section. None 4. ANTI BRIBERY & CORRUPTION Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to research by revent, debetch and report biblews and corrusten? To Does the Entity have a enterprise wide programme that sets minimum. ABC standards? To Does the Entity have a dequales staff with appropriate levels of experience/expertise sponsible for coordination the ABC programme? To Does the Entity have a global ABC policy that. To Does the Entity have a global ABC policy that. To Does the Entity have a global ABC policy or not receiving of anything of value, directly in indirectly, if improperly interded to influence activity, if improperly interded to influenc			
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reporting on the status of the ABC programme? The status of the ABC programme? Wes Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? Yes If N, provide the date when the last ABC EWRA was			
38 Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? 38 a If N, provide the date when the last ABC EWRA was			Yes
(EWRA) been completed in the last 12 months? Yes 38 a If N, provide the date when the last ABC EWRA was	reportin	ng on the status of the ABC programme?	100
38 a If N, provide the date when the last ABC EWRA was	Has the	e Entity's ABC Enterprise Wide Risk Assessment	
38 a If N, provide the date when the last ABC EWRA was			Yes
	a If N.	I, provide the date when the last ABC EWRA was	
20. Dogs the Faths have as ADC assistant site after that is	D "	the Estitute on ADC and the Link way	
39 Does the Entity have an ABC residual risk rating that is			Van
the net result of the controls effectiveness and the			res
inherent risk assessment? Does the Editive ADC CIVIDA cover the inherent side.			
Does the Entity's ABC EWRA cover the inherent risk components detailed below:			
40 a Retential liability expected by intermediaries and other			
third-party providers as appropriate Yes			Yes
40 b Corruption risks associated with the countries and			
industries in which the Entity does business, directly or Yes			Yes
through intermediaries			
40 c Transactions, products or services, including those			
that involve state-owned or state-controlled entities or Yes			Yes
public officials			
40 d Corruption risks associated with gifts and hospitality,			
hiring/internships, charitable donations and political Yes	d Corr		
contributions			Yes

40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities 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, C	TF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least	
41	annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	Yes
48 a1		Yes
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	Yes
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
	Prohibit opening and keeping of accounts for Section	Yes
49 f	311 designated entities	
49 f 49 g		Yes

49 i	Define the process for escalating financial crime risk	
	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
		165
40 le	risk Define the process for exiting clients for financial	
49 k		Vac
	crime reasons that applies across the entity, including	Yes
	foreign branches and affiliates	
49	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	
	relationship	
49 m	Outline the processes regarding screening for	
	sanctions, PEPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal	Yes
	"watchlists"	
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?	1.55
51 a	If Y, what is the retention period?	
		5 years or more
52	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	165
52 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context	
53		
53	If appropriate, provide any additional information/context to the answers in this section.	
53		
53		
	to the answers in this section.	
6. AML, C	to the answers in this section. CTF & SANCTIONS RISK ASSESSMENT	
	to the answers in this section. CTF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent	
6. AML, 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:	Vio
6. AML, C 54 54 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	Yes
6. AML, C 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	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	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 54 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	Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 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:	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 Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 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	Yes Yes Yes Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 55 a 55 b 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	Yes Yes Yes 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. 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	Yes Yes Yes Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 55 a 55 b 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	Yes Yes Yes Yes Yes Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 55 d 55 d 55 a 55 b 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	Yes
6. AML, C 54 54 a 54 b 54 c 55 d d 55 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 Training and Education	Yes
6. AML, C 54 54 a 54 b 54 c 55 d 55 d 55 a 55 b 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	Yes
6. AML, C 54 54 a 54 b 54 c 55 d d 55 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 Training and Education	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 a 55 a 55 c 55 d 55 e 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	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 5 55 a 55 b 55 c 55 d 55 e 55 f 55 g	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	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	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 d 55 a 55 a 55 c 55 d 55 e 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? 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	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	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	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	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	Yes
6. AML, C 54 54 a 54 b 554 c 554 c 555 c 555 c 555 d 555 c 555 f 555 g 556 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.	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	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 54 d 55 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 54 a 54 b 54 c 54 d 55 5 55 a 55 b 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: Client	Yes
6. AML, C 54 54 a 54 b 554 c 554 c 555 c 555 c 555 d 555 c 555 f 555 p 556 a 57 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 54 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h 56 6 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 554 c 555 c 555 c 555 d 555 c 555 f 555 p 556 a 57 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 Channel Geography	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 7 55 9 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 Yes
6. AML, C 54 54 a 54 b 54 c 55 d 55 c 55 d 57 c 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 Does the Entity's Sanctions EWRA cover the controls	Yes Yes
6. AML, C 54 54 a 54 b 554 c 554 c 555 c 55 d 555 c 55 d 55 c 55 d 55 6 55 a 55 f 55 g 55 f 55 g 55 h 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 Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	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 7 55 7 57 a 57 a 57 d 58 88 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 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 54 c 55 d 55 a 55 c 55 d 55 a 55 c 55 d 55 a 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 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 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 7 55 7 57 a 57 a 57 d 58 88 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 Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes

58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59 g	Has the Entity's Sanctions EWRA been completed in the	
50	last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA	
	was completed.	
60	Confirm that all responses provided in the above Section	
60	are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to	
00 a	and the branch/es that this applies to.	
	and the branen see that the applies to.	
61	If appropriate, provide any additional information/context	
	to the answers in this section.	
7 KYC C	CDD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	
30	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	25%
	beneficial ownership identification?	
67	Does the due diligence process result in customers	Yes
67.0	receiving a risk classification?	
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	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)	
	, , , , , , , , , , , , , , , , , , , ,	
<u></u>	For high right pap individual austrance in a site of the section	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4	Other	100
68 a4a	If yes, please specify "Other"	
JU 040	ii yes, piease specily. Other	
69	Does the Entity have a risk based approach to screening	
	customers for Adverse Media/Negative News?	
	10V :- 10:	
69 a	If Y, is this at:	V
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

	T T.	ls.
69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening	
	customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
		Yes
71 a3	Trigger event	Tes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk	Yes
	rating (Periodic Reviews)?	100
74 a	If yes, select all that apply:	
74 a1	Less than one year	No
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	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?	Yes
76 c	Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	EDD on risk-based approach
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	Do not have this category of customer or industry
		Prohibited
76 g	Marijuana-related Entities	
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
76 I	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
76 p	PEP Related	EDD on risk-based approach
76 q	Precious metals and stones	EDD on risk-based approach
76 r	Red light businesses/Adult entertainment	Prohibited 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
	Used Car Dealers	
76 w		EDD on risk-based approach
76 y	Virtual Asset Service Providers Other (specify)	EDD on risk-based approach
77	If restricted, provide details of the restriction	Prequisite is an adress in Austria and comparable starndards and requirements as for correspondent bank relationships. The bank account can be opened solely with the explicit agreement of the AML officer, in some cases the agreement of the managing board ist alos necessary.
78	Does EDD require senior business management and/or compliance approval?	Yes

78 a	If Y indicate who provides the approval:	Compliance
79	Does the Entity have specific procedures for onboarding	
	entities that handle client money such as lawyers,	Yes
	accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or quality	Vec
	review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	165
81 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
82	If appropriate, provide any additional information/context	
02	to the answers in this section.	
	to the driswers in this section.	
8. MONITO	ORING & REPORTING	
83	Does the Entity have risk based policies, procedures and	
	monitoring processes for the identification and reporting	Yes
	of suspicious activity?	
84	What is the method used by the Entity to monitor	Combination of automated and manual
	transactions for suspicious activities?	Sometiment of automated and manual
84 a	If manual or combination selected, specify what type	
	of transactions are monitored manually	Transations are monitored automatically. Transactions suspect to money laundry, financing of terrorism or
		sanction relevance are checked manually.
		·
84 b	If automated or combination selected, are internal	
04 5	system or vendor-sourced tools used?	Both
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is	
04 51	the name of the vendor/tool?	
		SMARAGD by Targens
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring	< 1 year
	application last calibrated?	- i your
85	Does the Entity have regulatory requirements to report	Yes
	suspicious transactions?	
85 a	If Y, does the Entity have policies, procedures and	Van
	processes to comply with suspicious transaction	Yes
86	reporting requirements? Does the Entity have policies, procedures and processes	
80	to review and escalate matters arising from the	V
	monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management	V
	programme to ensure that complete data for all	Yes
00	transactions are subject to monitoring?	
88	Does the Entity have processes in place to respond to	Yes
	Request For Information (RFIs) from other entities in a timely manner?	100
89	Does the Entity have processes in place to send	
	Requests for Information (RFIs) to their customers in a	Yes
	timely manner?	
90	Confirm that all responses provided in the above Section	V
	are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
	I and the second	
91	If appropriate, provide any additional information/context	
	to the answers in this section.	
9. PAYME	NT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment	
	Transparency Standards?	Yes

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	
93 01	ii 1, specify the regulation	EU-Geldtransfer Verordnung
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	1.00
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. SAN	CTIONS	
98	Does the Entity have a Sanctions Policy approved by	
30	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	Both Automated and Manual
102 a	screening? If 'automated' or 'both automated and manual'	
100 -1	selected:	D-th-
102 a1 102 a1a	Are internal system of vendor-sourced tools used? If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	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	I lead for screening customers and handicial numbers and for filtering transpositional data
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
	(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)	
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	
11. TRAIN	IING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to :	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	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
		A
114 a	If Y, how frequently is training delivered?	Annually

### A County with questions the difference's relate to an internal to the third applies to the answers in this section. ### A County ASSURANCE ICOMPLIANCE TESTING Page of the properties of the properties of the answer of the properties of the answers in this section. Page of the properties of the properties of the answer of county to the control of the properties			
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Compliance Testing process (capatita from the independent Austi Europeans provided in the above Section Yes Total Institute Yes Total In	117	Assurance programme for financial crime (separate from	Yes
119 a Confirm that all responses provided in the above Section are representative of all the LEs branches and the LEs than	118	Compliance Testing process (separate from the	Yes
## 17. Carriny which questions the difference/s relate to and the branches that this applies to. ### 17. Carriny which questions the difference/s relate to the answers in this section. ### 17. Carriny which questions the section of the answers in this section. ### 17. Carriny which questions the section of the answers in this section. ### 17. Carriny which questions the section of the independent third party or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basic part in the firstly part of the section of the independent third party or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions programme by the following part of the section of the independent third party over the following areas: #### 122 A	119	Confirm that all responses provided in the above Section	Yes
121	119 a	If N, clarify which questions the difference/s relate to	
In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? 122 How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following. 122 Internal Audit Department Yearly 123 Dees the internal audit function or other independent third party over the following areas: 124 a Internal Audit Department Yearly 125 Dees the internal audit function or other independent third party over the following areas: 126 a Proceedings of the Audit of Party Yearly 127 a Procedure over the following areas: 128 b Internal Revision or other independent third party over the following areas: 129 b Internal Revision or other independent third party over the following areas: 120 c Governance Yes 121 b Enterprise Wide Risk Assessment Yes 122 b Enterprise Wide Risk Assessment Yes 123 c Governance Yes 123 c Revision of the Audit of Party Yes 123 c Revision of the Audit of Party Yes 123 c Revision of the Audit of Party Yes 123 c Revision of the Audit of Party Yes 123 c Revision of the Audit of Party Yes 123 c Revision of the Audit of Party Yes 123 c Revision of the Audit of Party Yes 123 c Revision of the Audit of Party Yes 124 c Revision of the Audit of Party Yes 125 c Revision of the Audit of Party Yes 126 c Revision of the Audit of Party Yes 127 c Revision of the Audit of Party Yes 128 c Revision of the Audit of Party Yes 129 c Revision of the Audit of Party Yes 120 c Revision of Party Yes 121 c Revision of Party Yes 122 c Revision of Party Yes 123 c Revision of Party Yes 124 c Revision of Party Yes 125 c Revision of Party Yes 126 c Revision of Party Yes 127 c Revision of Party Yes 128 c Revision of Party Yes 129 c Revision of Party Yes 129 c Revision of Party Yes 129 c Revision of Party Yes 120 c Revision of Party Yes 121 c Revision of Party Yes 122 c R	120		
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How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: 122 a	and the second second second second	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular	Yes
Internal Audit Department Yearly Yearly	122	How often is the Entity audited on its AML, CTF, ABC,	
122 b	122 a		Vearly
Does the internal audif function or other independent third party cover the following areas: 123 a AML_CTF_ABC, Fraud and Sanctions policy and procedures 123 b Enterprise Wide Risk Assessment Yes 123 c Governance 123 c Governance 123 c RYC/CDD/EDD and underlying methodologies Yes 123 e Name Screening & List Management Yes 123 e Name Screening & List Management Yes 123 g Suspicious Activity Filling 124 Technology 125 y Tessaction Monitoring 125 i Transaction Screening including for sanctions 126 y Transaction Screening including for sanctions 127 Are adverse findings from internal & external audif tracked to completion and assessed for adequacy and completions of the sanctive of all the LE's branches 126 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible for			
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Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible for Ves	14 EDAL	ID .	
Does the Entity have a dedicated team responsible for Vos		Does the Entity have policies in place addressing fraud	Yes
	128	Does the Entity have a dedicated team responsible for	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 AG (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

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

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

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

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

I, Mag. Michael Blenke (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

I, Mag. Milenko Petrovic (MLRO or equivalent), certify that Hnave read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

26 (Signature & Date) HAG. MILENKO PETRUVIC

MAGNICHAEL BUEMKE (Signature & Date)

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