

Financial Institution Name: Location (Country) : JOINT STOCK COMPANY "BANK "UKRAINIAN CAPITAL"
UKRAINE

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 CBDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a reaponse 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#	terrally different than its Entity Head Office, a separate questionnaire car Question	Answer
	& OWNERSHIP	Allower
1	Full Legal Name	
	i di Edga Hario	JOINT STOCK COMPANY "BANK "UKRAINIAN CAPITAL"
2	Append a list of foreign branches which are covered by this questionnaire	The Bank has no foreign branches
3	Full Legal (Registered) Address	67, Beresteyskyi (Peremohy) ave., Kyiv, 03117, Ukraine
4	Full Primary Business Address (if different from above)	No.
5	Date of Entity incorporation/establishment	25.12.1992
6 6 a	Select type of ownership and append an ownership chart if available Publicly Traded (25% of shares publicly traded)	No 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	No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	Sergiy Byelashov (Ukraine)-48,9196%, "Skela Tercium" LLC(Ukraine)-21,3864%, "Sokil LTD "(Ukraine)-19,9999% (direct shareholders). The Ultimate beneficial owners of the Bank are:Sergiy Byelashov, Yevhenia Fedorovych, Liliana Byelashova, Dariia Ziydar
7	% of the Entity's total shares composed of bearer shares	JOINT STOCK COMPANY "BANK "UKRAINIAN CAPITAL" does not issue bearer shares
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	no
10	Name of primary financial regulator/supervisory authority	The National Bank of Ukraine
11	Provide Legal Entity Identifier (LEI) if available	n/a
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	n/a
13	Jurisdiction of licensing authority and regulator of ultimate parent	n/a
	Select the business areas applicable to the Entity	
14 14 a 14 b	Select the business areas applicable to the Entity Retail Banking Private Banking	Yes Yes

14 c	Commercial Banking	IV
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f		No .
	Financial Markets Trading	No
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	Yes
141	Multilateral Development Bank	No
14 j	Wealth Management	No
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 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		E4 000
16 b	Number of employees Total Assets	51-200
16 D	Confirm that all responses provided in the above Section	Between \$10 and \$100 million
	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. PRODU	to the answers in this section. UCTS & SERVICES	
2. PRODI	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services:	
2. PRODI 19	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking	No
2. PRODI 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	No
2. PRODI 19	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking	No
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b	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	No
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to the answers in this section. 3. AML, CTF & SANCTIONS PROGRAMME 22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 A Appointed Officer with sufficient experience/expertise Yes 22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes 22 d Cash Reporting Yes 22 d Cosh Reporting Yes 22 f EDD Yes 22 f EDD Yes 22 g Independent Testing Yes 22 h Periodic Review Yes 22 h Periodic Review Yes 22 l Policies and Procedures Yes 22 j PEP Screening Yes			
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19 c	19 b		No.
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Hotel Mail			
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19		110000000000000000000000000000000000000	
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Playment services to non-bank entities who may then offer thrisp party perspect services to the causement of the party perspect and that apply below? 19 11 FY, please select all that apply below? 19 12 Thrisp Ray Bayment Services Providers No. 19 14 Commerce Patient Services (NAPP) 19 15 Other - Please explain 19 1 Private Barring 19 1 Private Barring 19 1 Remainded Capture (RCC) 19 1 No. 19 15 Sorred Vallas Instruments 19 1 Sorred Vallas Instruments No. 19 19 For each of the following please state whether you applicable level of due diligence of the capture o	19 h	Payable Through Accounts	No
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19 pt Check cashing service No		offer the service to walk-in customers and if so, the	
19 pt Check cashing service No		applicable level of due diligence:	
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19 p2a			
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19 p4 Sale of Monetary Instruments No			
19 p4a			
If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Identification and verification of clients is carried out by making paper copies of documents in the personal presence of the client/client represence ADM in the presence of the client/client represence of STATE ENTERPRISE DIA (SE "DIA") with the imposition of qualified electronic signature (CES) and video verification. The amount of funds for whichthe financial transaction are representative of all the LE's branches. Yes 20			No
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22 g Independent Testing Yes 22 h Periodic Review Yes 22 i Policies and Procedures Yes 22 j PEP Screening Yes 22 k Risk Assessment Yes	19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F. SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting	presence of the client/client representative. Also, the Bank is developing modern methods of identification and verification of cliens, in particular, with the help of STATE ENTERPRISE DIIA (SE "DIIA") with the imposition of qualified electronic signature (QES) and video verification. The amount of funds for whichthe financial transaction caried out is equal to or exceeds 400 000 hownias. Yes Yes Yes Yes Yes Yes
22 h Periodic Review Yes 22 i Policies and Procedures Yes 22 j PEP Screening Yes 22 k Risk Assessment Yes	19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 c	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F. SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD	presence of the client/client representative. Also, the Bank is developing modern methods of identification and verification of cliens, in particular, with the help of STATE ENTERPRISE DIIA (SE "DIIA") with the imposition of qualified electronic signature (QES) and video verification. The amount of funds for whichthe financial transaction caried out is equal to or exceeds 400,000 hownias. Yes Yes Yes Yes Yes Yes Yes Y
22 h Periodic Review Yes 22 i Policies and Procedures Yes 22 j PEP Screening Yes 22 k Risk Assessment Yes	19 p5 19 q 20 20 a 21 3. AML, CT 22 a 22 b 22 c 22 d 22 f	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F. SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	presence of the client/client representative. Also, the Bank is developing modern methods of identification and verification of cliens, in particular, with the help of STATE ENTERPRISE DIIA (SE "DIIA") with the imposition of qualified electronic signature (QES) and video verification. The amount of funds for whichthe financial transaction caried out is equal to or exceeds 400 000 hownias. Yes Yes Yes Yes Yes Yes Yes Y
22 i Policies and Procedures Yes 22 j PEP Screening Yes 22 k Risk Assessment Yes	19 p5 19 q 20 20 a 21 3. AML, CT 22 a 22 b 22 c 22 d 22 e 22 f 22 g	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F. SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing	presence of the client/client representative. Also, the Bank is developing modern methods of identification and verification of cliens, in particular, with the help of STATE ENTERPRISE DIIA (SE "DIIA") with the imposition of qualified electronic signature (QES) and video verification. The amount of funds for whichthe financial transaction caried out is equal to or exceeds 400 000 hownias. Yes Yes Yes Yes Yes Yes Yes Y
22 j PEP Screening Yes 22 k Risk Assessment Yes	19 p5 19 q 20 20 a 21 3. AML, CT 22 a 22 b 22 c 22 d 22 f	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F. SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CIDD Independent Testing	presence of the client/client representative. Also, the Bank is developing modern methods of identification and verification of cliens, in particular, with the help of STATE ENTERPRISE DIIA (SE "DIIA") with the imposition of qualified electronic signature (QES) and video verification. The amount of funds for whichthe financial transaction caried out is equal to or exceeds 400 000 hownias. Yes Yes Yes Yes Yes Yes Yes Y
22 k Risk Assessment Yes	19 p5 19 q 20 20 a 21 3. AML, CT 22 a 22 b 22 c 22 d 22 e 22 f 22 g	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	presence of the client/client representative. Also, the Bank is developing modern methods of identification and verification of cliens, in particular, with the help of STATE ENTERPRISE DIIA (SE "DIIA") with the imposition of qualified electronic signature (QES) and video verification. The amount of funds for whichthe financial transaction caried out is equal to or exceeds 400 000 hownias. Yes Yes Yes Yes Yes Yes Yes Y
	19 p5 19 q 20 20 a 21 3. AML, GT 22 22 a 22 b 22 c 22 d 22 c 22 f 22 g 22 h 22 i	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F. SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	presence of the client/client representative. Also, the Bank is developing modern methods of identification and verification of cliens, in particular, with the help of STATE ENTERPRISE DIIA (SE "DIIA") with the imposition of qualified electronic signature (QES) and video verification. The amount of funds for whichthe financial transaction caried out is equal to or exceeds 400 000 hownias. Yes Yes Yes Yes Yes Yes Yes Y
as 1 Various T8S	19 p5 19 q 20 20 a 21 3. AML, CT 22 a 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 j	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F. SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review Policies and Procedures PEP Screening	presence of the client/client representative. Also, the Bank is developing modern methods of identification and verification of cliens, in particular, with the help of STATE ENTERPRISE DIIA (SE "DIIA") with the imposition of qualified electronic signature (QES) and video verification. The amount of funds for whichthe financial transaction caried out is equal to or exceeds 400 000 hownias. Yes Yes Yes Yes Yes Yes Yes Y
	19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f 22 p 22 h 22 i 22 j 22 k	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F. SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment	presence of the client/client representative. Also, the Bank is developing modern methods of identification and verification of cliens, in particular, with the help of STATE ENTERPRISE DIIA (SE "DIIA") with the imposition of qualified electronic signature (QES) and video verification. The amount of funds for which the financial transaction caried out is equal to or exceeds 400 000 hownias. Yes Yes Yes Yes Yes Yes Yes Y

22 o 23	Suspicious Activity Reporting	Yes
23	Training and Education	Yes
	Transaction Monitoring	Yes
	How many full time employees are in the Entity's AML,	1-10
	CTF & Sanctions Compliance Department?	1-10
24	Is the Entity's AML, CTF & Sanctions policy approved at	
1	least annually by the Board or equivalent Senior	Voc
1	Management Committee? If N, describe your practice in	Yes
	Question 29.	20
25	Does the Board receive, assess, and challenge regular	
r	reporting on the status of the AML, CTF, & Sanctions	Yes
	programme?	
	Does the Entity use third parties to carry out any	
9	components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	
	in the provider of distance	
1		
- 1		
	Does the entity have a whistleblower policy?	Yes
	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	165
28 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
29 H	If appropriate, provide any additional information/context	
	to the answers in this section.	
		1
,		
	BERY & CORRUPTION	British and the Control of the Contr
30 F	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and	Voc
n	requirements to reasonably prevent, detect and report	Yes
b	bribery and corruption?	
	Does the Entity have an enterprise wide programme that	Yes
	sets minimum ABC standards?	163
	Has the Entity appointed a designated officer or officers	
	with sufficient experience/expertise responsible for	Yes
	coordinating the ABC programme?	
	Does the Entity have adequate staff with appropriate	
	levels of experience/expertise to implement the ABC	Yes
	programme?	
	Is the Entity's ABC programme applicable to:	Joint ventures
	Does the Entity have a global ABC policy that:	- Table 1
35 a	Prohibits the giving and receiving of bribes? This	73
	includes promising, offering, giving, solicitation or	
	receiving of anything of value, directly or indirectly, if	Yes I will all the high the hi
	improperly intended to influence action or obtain an	
35 b	advantage Includes enhanced requirements regarding interaction	
33 0	with public officials?	Yes
35 c	Includes a prohibition against the falsification of books	
35 C	and records (this may be within the ABC policy or any	
	other policy applicable to the Legal Entity)?	Yes
1	other policy applicable to the Legal Entity)?	
	Does the Entity have controls in place to monitor the	Von
	effectiveness of their ABC programme?	Yes
е	Does the Board receive, assess, and challenge regular	
37 E		Vac
37 E	reporting on the status of the ABC programme?	Yes
37 E	reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment	Yes
37 C		
37 C	Has the Entity's ABC Enterprise Wide Risk Assessment	Yes Yes
37 C	Has the Entity's ABC Enterprise Wide Risk Assessment	
37 C	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	
37 C	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	
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37 E	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.	
37 C C C C C C C C C C C C C C C C C C C	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	Yes
37	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 he net result of the controls effectiveness and the	
37 C C C C C C C C C C C C C C C C C C C	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 nherent risk assessment?	Yes
37	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 he net result of the controls effectiveness and the nherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk	Yes
37	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 he net result of the controls effectiveness and the nherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
37	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 nherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other	Yes
38 H (IIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII	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 he net result of the controls effectiveness and the nherent 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	Yes
37	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 he net result of the controls effectiveness and the nherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk zomponents detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and	Yes Yes
38 H (IIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII	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 nherent 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	Yes Yes
37	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 nherent 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	Yes Yes
38 H (IIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII	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 he net result of the controls effectiveness and the nherent 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	Yes Yes Yes Yes
37	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 he net result of the controls effectiveness and the nherent 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	Yes Yes
37	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 nherent 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	Yes Yes Yes Yes
37	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 he net result of the controls effectiveness and the nherent 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 Corruption risks associated with gifts and hospitality,	Yes Yes Yes Yes Yes Yes
37	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 nherent 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	Yes Yes Yes Yes

40 e	Changes in business activities that may materially	Yes
	increase the Entity's corruption risk	169
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:	· 医克拉氏 (1996) (1996) (1996) (1996) (1996) (1996) (1996) (1996) (1996) (1996) (1996) (1996) (1996) (1996) (1996)
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	No .
42 f	Non-employed workers as appropriate (contractors/consultants)	No
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
5. ANL,	CTF & 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 annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	No
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	No
48 b1	If Y, does the Entity retain a record of the results?	
49	Does the Entity have policies and procedures that:	图像是图像是一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个
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 е	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	
-401		lv
	issues/potentially suspicious activity identified by	Yes
	employees	
40.1		
49 j	Define the process, where appropriate, for terminating	
	existing customer relationships due to financial crime	Yes
	risk	
49 k	Define the process for exiting clients for financial	
	crime reasons that applies across the entity, including	Vac
		165
-	foreign branches and affiliates	
491	Define the process and controls to identify and handle	
401		
	customers that were previously exited for financial	Yes
	crime reasons if they seek to re-establish a	165
	relationship	
49 m	Outline the processes regarding screening for	
	sanctions, PEPs and Adverse Media/Negative News	Yes
	Sanctions, i Li s and Adverse Media/146gative 146Ws	
49 n	Outline the processes for the maintenance of internal	
40 11		Yes
	"watchlists"	1 2 2 2
50	Has the Entity defined a risk tolerance statement or	
	similar document which defines a risk boundary around	Yes
		165
	their business?	
51	Does the Entity have record retention procedures that	V.
	comply with applicable laws?	Yes
-		
51 a	If Y, what is the retention period?	
		5 years or more
		5 years or more
E2	Confirm that all seemenges are ideal in the above of	
52	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	100
52 a	If N, clarify which questions the difference/s relate to	
52 a		
	and the branch/es that this applies to.	
	The state of the s	
53	If appropriate, provide any additional information/context	
	to the answers in this section.	
	to the answers in this section.	I
PAGES		
6. AML, C	TF & SANCTIONS RISK ASSESSMENT	
	TF & SANCTIONS RISK ASSESSMENT	
6. AML, C 54	Does the Entity's AML & CTF EWRA cover the inherent	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Voc
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Yes Yes
54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Yes
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Yes
54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Yes
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes Yes
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls	Yes Yes
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes Yes
54 a 54 b 54 c 54 d 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes Yes Yes
54 a 54 b 54 c 54 d 55	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
54 a 54 b 54 c 54 d 55 55 a 55 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Yes Yes
54 a 54 b 54 c 54 d 55 55 a 55 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 55 a 55 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does' the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative	Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 d 55 a 55 b 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d	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
54 a 54 b 54 c 54 d 55 65 a 55 b 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes
54 a 54 b 54 c 54 d 55 a 55 c 55 c 55 c 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes
54 a 54 b 54 c 54 d 55 65 a 55 b 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	Yes
54 a 54 a 54 b 54 c 54 d 55 b 55 c 55 d 55 d 55 b 55 c 55 d 55 f 55 f 55 f 55 h 55 f 55 h	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	Yes
54 a 54 b 54 c 54 d 55 a 55 c 55 c 55 c 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does' the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in	Yes
54 a 54 b 54 c 54 d 55 d 55 c 55 d 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
54 a 54 b 54 c 54 d 55 d 55 c 55 d 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
54 a 54 a 54 b 54 c 54 d 55 b 55 c 55 d 55 d 55 b 55 c 55 d 55 f 55 f 55 f 55 h 55 f 55 h	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
54 a 54 b 54 c 54 d 55 d 55 c 55 d 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
54 a 54 b 54 c 54 d 55 d 55 c 55 d 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
54 a 54 b 54 c 54 d 55 d 55 c 55 d 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
54 a 54 b 54 c 54 d 55 d 55 c 55 d 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 f 55 g 55 h 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
54 a 54 b 54 c 54 d 55 d 55 c 55 d 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 f 55 g 55 h 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 65 h 56 a 56 a 57	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
54 a 54 b 54 c 54 c 55 c 55 a 55 b 55 c 55 d 55 d 5	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 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
54 a 54 b 54 c 54 c 55 c 55 a 55 b 55 c 55 d 55 d 5	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 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
54 a 54 b 54 c 54 c 55 c 55 c 55 c 55 d 5	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes
54 a 54 b 54 c 54 c 55 c 55 a 55 b 55 c 55 d 55 d 5	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 b 55 c 55 d 55 d 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 5	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 b 55 c 55 d 55 d 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 5	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 f 55 d 55 f 55 d 55 f 55 f	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
54 a 54 b 54 c 54 c 55 c 55 a 55 c 55 d 55 c 55 d 55 d 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
54 a 54 b 54 c 54 d 555 c 55 a 55 b 55 c 55 d 55 d 55 d 55 f 55 f 55 f 55 f	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
54 a 54 a 54 b 54 c 55 d 55 d 55 d 55 d 55 b 55 c 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 5	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes
54 a 54 a 54 b 54 c 54 c 55 c 55 a 55 a 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 f 55 c 55 f 55 c 55 f 55 c 55 f 55 c 55 d 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening 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: Client Crannel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence List Management	Yes
54 a 54 a 54 b 54 c 55 d 55 d 55 d 55 d 55 b 55 c 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 55 d 5	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 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: Client Crannel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence List Management	Yes
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes

58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
		res
59	Has the Entity's Sanctions EWRA been completed in the	Yes
-	last 12 months?	1.55
59 a	If N, provide the date when the last Sanctions EWRA	
	was completed.	
	199104-000-000	'
	/	
		1
60	Confirm that all responses provided in the above Section	
00	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.	
0.4	Management was ide and additional later with for the	
61	If appropriate, provide any additional information/context	
	to the answers in this section.	
T (6) (8)		
	OD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	
CALLED TO	CDD must be completed, e.g. at the time of onboarding	Yes
	or within 30 days?	I
64	Which of the following does the Entity gather and retain	
5-7	when conducting CDD? Select all that apply:	· · · · · · · · · · · · · · · · · · ·
CA o		
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	The state of the s
66	What is the Entity's minimum (lowest) threshold applied to	
	beneficial ownership identification?	10%
67	Does the due diligence process result in customers	
•	receiving a risk classification?	Yes
67 a		
0/ a	If Y, what factors/criteria are used to determine the	。 第一章
- A	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	
J/ 40	Strict (apocity)	
		Assessment/Evaluation of roputation Channel for acquidity
		Assesment/Evaluation of reputation, Channel for providing service (product)
68	For high risk pan individual austress is a site of the	
00	For high risk non-individual customers, is a site visit a part	Yes
00 -	of your KYC process?	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
68 a	If Y, is this at:	· · · · · · · · · · · · · · · · · · ·
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4	Other	No
68 a4a	If yes, please specify "Other"	110
00 a4d	ii yes, piease specity "Other"	
		1 1 2 4 4 2 2 4 3 4 5
		*
		1 I I I I I I I I I I I I I I I I I I I
	D 1. 5.12 1	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
69	Does the Entity have a risk based approach to screening	
	customers for Adverse Media/Negative News?	Yes
		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
69 a	If Y, is this at:	The state of the s
69 a1	Onboarding	Yes
69 a2	KYC renewal	
00 02	T KTO IGIIGWAI	Yes

00 -0	Triange quant	V.
69 a3 70	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	
71	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
71 a3 72	Trigger event	Yes
12	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	Yes
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)	
y	, , ,	At lease one year for high-risk clients, 3 years for medium-risk clients and 5 years for low-risk clients
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	Always subject to EDD
76 b	Respondent Banks	Do not have this category of customer or industry
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	Do not have this category of customer or industry
76 d	Extractive industries	EDD on risk-based approach
76 e	Gambling customers	EDD on risk-based approach
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	Do not have this category of customer or industry
76 i	Non-account customers	EDD on risk-based approach
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	EDD on risk-based approach
761	Nuclear power	Do not have this category of customer or industry
76 m	Payment Service Providers	EDD on risk-based approach
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
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	Do not have this category of customer or industry
76 y	Other (specify)	e, the street construction
77	If restricted, provide details of the restriction	
70	Door EDD samiles conies have	
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	
00	review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section	
01	are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to	
ora	and the branch/es that this applies to	
	and the branchives that this applies to	
82	If appropriate, provide any additional information/context	
	to the answers in this section.	
	and the state of the property and the state of the state	
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?	Combination of automated and manual
84 a	If manual or combination selected, specify what type	
	of transactions are monitored manually	The tranactions which don't correspond with the financial standing and/or sense of the client's business activity
		are detected/checked manually
		are detected risched manually
84 b	K automated as a subjection and at a large to the	
84 D	If automated or combination selected, are internal	Vendor-sourced tools
84 b1	system or vendor-sourced tools used?	
04 D I	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	
	the name of the vendor/toor?	CS LTD, B2-CORE BANKING SYSTEM
		CO LID, BZ-CORE BANKING STSTEM
	, and the second	
84 b2	When was the tool last updated?	<1 year
84 b3	When was the automated Transaction Monitoring	- Tyber
04 D3	application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report	***************************************
00	suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and	· · · · · · · · · · · · · · · · · · ·
00 4	processes to comply with suspicious transaction	Yes
	reporting requirements?	165
86	Does the Entity have policies, procedures and processes	
00	to review and escalate matters arising from the	V
	monitoring of customer transactions and activity?	Yes
07	The state of the s	
87	Does the Entity have a data quality management	
	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	
	Request For Information (RFIs) from other entities in a	Yes
20	timely manner?	
89	B # # # # #	
OB	Does the Entity have processes in place to send	
08	Requests for Information (RFIs) to their customers in a	Yes
	Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section	
90	Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes Yes
	Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to	
90	Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches	
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90 90 a	Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference	
90	Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
90 90 a	Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference	
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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	Law of Ukraine "On prevention from legalization (laundering) of ill-gotten gains, terrorist financing and financing of proliferation of weapons of mass destruction" No. 361-IX dd 06.12.2019
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. SANCT	IONS	
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)?	Yes
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 102 a1a	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a 18	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	CS LTD, B2 -CORE BANKING SYSTEM
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	Ligad for personing a vitamore and horseficial aureur and far filtering to a little light
	Sanctions List (LIN)	Used for screening customers and beneficial owners and for filtering transactional data
106 b	Sanctions List (UN) United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data

106 d	European Union Consolidated List (EU)	Not used
106 e	Lists maintained by other G7 member countries	Not used
106 f	Other (specify)	TWO USED
	,	Ukrainian sanctions list,used for screening customers and beneficial owners and for filtering tranactional data
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches,	Curre day to 2 basiness days
	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.	
	ING & 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
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above Section	Yes

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. It 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 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 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.	
116 If appropriate, provide any additional information/context to the answers in this section. 12. QUALITY ASSURANCE /COMPLIANCE TESTING 117 Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)?	
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Assurance programme for financial crime (separate from the independent Audit function)?	
118 Does the Entity have a program wide risk based	
Compliance Testing process (separate from the Yes	
independent Audit function)?	
Confirm that all responses provided in the above Section are representative of all the LE's branches Yes	
119 a If N, clarify which questions the difference/s relate to	
and the branch/es that this applies to.	
120 If appropriate, provide any additional information/context	
to the answers in this section.	
13. AUDIT	
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?	
How often is the Entity audited on its AML, CTF, ABC,	Managara Calabara Santa Calabara
Fraud and Sanctions programme by the following:	
122 a Internal Audit Department Yearly 122 b External Third Party Component based reviews	
123 Does the internal audit function or other independent third	
party cover the following areas:	
party cover the following areas: 123 a AML, CTF, ABC, Fraud and Sanctions policy and Voc	
party cover the following areas: 123 a AMI CTF ARC Fraud and Spections policy and	
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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.	
Wolfsberg Gr Declaration S Laundering, V JSC 'BANK'U every effort to The Financia obligations. The Financia	Chief Compliance Officer, Global Head of Financial Crimes Comp JKRAINIAN CAPITAL' (Financial Institut o remain in full compliance with all applicable financial crime laws I Institution understands the critical importance of having effective I Institution recognises the importance of transparency regarding	ng or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money oliance OR equivalent) ion name) is fully committed to the fight against financial crime and makes , regulations and standards in all of the jurisdictions in which it does business and holds accounts. e and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory parties to transactions in international payments and has adopted/is committed to adopting these standards. with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information
The Financial Institution commits to file accurate supplemental information on a timely basis.		
I, Yevhen Ch are complete I, Viktoriia An	(Global Head of Correspondent Banking of and correct to my honest belief, and that I am authorised to execute to my horfast belief, and that I am authorised to execute	or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ cute this declaration on behalf of the Financial Institution.
		The second secon