the Wolfsberg Group

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 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.

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13 Jurisdiction of licensing authority and regulator of ultimate parent	12		
Jurisdiction of licensing authority and regulator of ultimate parent		different from the Entity completing the DDQ)	n/a
parent			···-
parent			
parent n/a	13		
		parent	n/a

	10	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b	Private Banking	Yes
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	No
14 f	Financial Markets Trading	No
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	Yes
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
	Other (please explain)	NO .
14 k	Offier (please explain)	
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are	No
15 a	provided) If Y, provide the top five countries where the non-	
15 a	resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	201-500
16 b	Total Assets	Between \$10 and \$100 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	
2 DRODII	CTS & SERVICES	
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	No
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	
19 a1e	Does the Entity allow downstream relationships with foreign banks?	
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with	
19 a1g	foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	
40 -41	(MSBs)/Money Value Transfer Services (MVTSs)?	
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	
19 a1h2	MVTSs	
19 a1h3	PSPs	
13 01113	1 1013	

19 a1i	Does the Entity have processes and procedures in	
	place to identify downstream relationships with	
	MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
	Domestic Bulk Cash Delivery	No
19 d		
19 e	Hold Mail	No
19 f	International Cash Letter	No
	Low Price Securities	
19 g		No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then	
191		
	offer third party payment services to their customers?	No
19 i1	If Y , please select all that apply below?	
19 i2	Third Party Payment Service Providers	No
19 i3	Virtual Asset Service Providers (VASPs)	No
19 i4	eCommerce Platforms	No
19 i5	Other - Please explain	
19 10	Other - Flease explain	
19 j	Private Banking	Domestic
19 k	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
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
		NO .
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	Yes
	If yes, state the applicable level of due diligence	
19 p2a	1 1	
19 p3	Foreign currency conversion	Yes
19 p3a	If yes, state the applicable level of due diligence	Identification and Verification
19 p4	Sale of Monetary Instruments	No.
		INO
19 p4a	If yes, state the applicable level of due diligence	
ιυρ⊸α		
		Identification and verification of clients is carried out by making paper copies of documents in the personal
19 p5	If you offer other services to walk-in customers	
	If you offer other services to walk-in customers please provide more detail here, including	presence of the client/client representative. Also, the Bank is developing modern methods of identification and
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19 p5 19 q 20 20 a 21 3. AML, C 22 a 22 b 22 c 22 d 22 c 22 d 22 e 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. FF & 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 hnomias. Yes Yes Yes Yes Yes Yes Yes Y
19 p5 19 q 20 20 a 21 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. TF & 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	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 hnovnias. Yes Yes Yes Yes Yes Yes Yes Y
19 p5 19 q 20 20 a 21 3. AML, C 22 a 22 b 22 c 22 d 22 c 22 d 22 e 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. FF & 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 hnomias. Yes Yes Yes Yes Yes Yes Yes Y
19 p5 19 q 20 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	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. TF & 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	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 hnovnias. Yes Yes Yes Yes Yes Yes Yes Y
20 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 i 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. FF & 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 hnomias. Yes Yes Yes Yes Yes Yes Yes Y
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19 p5 19 q 20 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 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. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section.	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 hnvmias. Yes Yes Yes Yes Yes Yes Yes Y
19 p5 19 q 20 20 a 21 3. AML, C ² 22 a 22 b 22 c 22 c 22 c 22 f 22 g 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. IF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures 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 hnomias. Yes Yes Yes Yes Yes Yes Yes Y

	T = =	T.,
22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring How many full time employees are in the Entity's AML,	Yes
23	CTF & Sanctions Compliance Department?	11-100
24	Is the Entity's AML, CTF & Sanctions policy approved at	
24	least annually by the Board or equivalent Senior	L.
	Management Committee? If N, describe your practice in	Yes
	Question 29.	
25	Does the Board receive, assess, and challenge regular	
	reporting on the status of the AML, CTF, & Sanctions	Yes
	programme?	
26	Does the Entity use third parties to carry out any	No
	components of its AML, CTF & Sanctions programme?	
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	Yes
28 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context	
	to the answers in this section.	
4 41	LINEDY & CORDUNTION:	
	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and	Yes
	requirements to reasonably prevent, detect and report bribery and corruption?	
31	Does the Entity have an enterprise wide programme that	L.
0.	sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers	
	with sufficient experience/expertise responsible for	Yes
	coordinating the ABC programme?	
33	Does the Entity have adequate staff with appropriate	
	levels of experience/expertise to implement the ABC	Yes
	programme?	
34 35	Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that:	Joint ventures
35 a	Prohibits the giving and receiving of bribes? This	
33 a	includes promising, offering, giving, solicitation or	
	receiving of anything of value, directly or indirectly, if	Yes
	improperly intended to influence action or obtain an	
	advantage	
35 b	Includes enhanced requirements regarding interaction	Yes
	with public officials?	1ω
35 c	Includes a prohibition against the falsification of books	
	and records (this may be within the ABC policy or any	Vee
	other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to monitor the	
	effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular	Vee
	reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment	
	(EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was	
	completed.	
39	Does the Entity have an ABC residual risk rating that is	
		Yes
	the net result of the controls effectiveness and the	1
	the net result of the controls effectiveness and the inherent risk assessment?	
40		
	inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
	inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other	Yes
40 40 a	inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate	Yes
40	inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and	
40 40 a	inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or	
40 a 40 b	inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	
40 40 a	inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those	Yes
40 40 a 40 b	inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes

40 d		
	Corruption risks associated with gifts and hospitality,	
	hiring/internships, charitable donations and political	Yes
	contributions	
40 -	Changes in business activities that may materially	
40 e		Yes
	increase the Entity's corruption risk	
41	Does the Entity's internal audit function or other	
	independent third party cover ABC Policies and	Yes
	Procedures?	1.55
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
	2nd Line of Defence	
42 c		Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities	la.
	subject to ABC risk have been outsourced	No
42 f	Non-employed workers as appropriate	
42 1		No
	(contractors/consultants)	
43	Does the Entity provide ABC training that is targeted to	Yes
	specific roles, responsibilities and activities?	165
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	
45		
	to the answers in this section.	
5 AMI (CTF & SANCTIONS POLICIES & PROCEDURES	
	Has the Entity documented policies and procedures	
46		
	consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent,	
	detect and report:	
46 a	Money laundering	V
		Yes
46 b	Terrorist financing	Yes
	Terrorist financing Sanctions violations	
46 b 46 c	Terrorist financing Sanctions violations	Yes Yes
46 b	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least	Yes
46 b 46 c 47	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually?	Yes Yes
46 b 46 c	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and	Yes Yes
46 b 46 c 47 48	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against:	Yes Yes Yes
46 b 46 c 47 48	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and	Yes Yes
46 b 46 c 47 48	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards	Yes Yes Yes
46 b 46 c 47 48 48 a 48 a1	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes No
46 b 46 c 47 48 48 a 48 a1 48 b	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards	Yes Yes Yes
46 b 46 c 47 48 48 a 48 a1	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes No
46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes No
46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b 49	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that:	Yes Yes Yes No
46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and	Yes Yes Yes No
46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 a	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes Yes Yes No
46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b 49	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and	Yes Yes Yes Yes Yes Yes No No Yes
46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 a	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for	Yes Yes Yes No
46 b 46 c 47 48 48 a 48 a1 48 b 48 b1 49 a 49 b	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes Yes Yes Yes Yes Yes No No No Yes Yes
46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 a	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide	Yes Yes Yes Yes Yes Yes No No Yes
46 b 46 c 47 48 48 a 48 a1 48 b 48 b1 49 a 49 c	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes Yes Yes Yes No No Ves Yes Yes Yes
46 b 46 c 47 48 48 a 48 a1 48 b 48 b1 49 a 49 b	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks	Yes Yes Yes Yes Yes Yes No No No Yes Yes
46 b 46 c 47 48 48 a 48 a1 48 b 48 b1 49 a 49 c	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes Yes Yes No No No Yes Yes Yes Yes
46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with shell banks Prohibit dealing with another entity that provides	Yes Yes Yes Yes No No Ves Yes Yes Yes
46 b 46 c 47 48 48 a 48 a1 48 b 48 b1 49 b 49 c 49 c 49 d 49 e	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with nother entity that provides services to shell banks	Yes Yes No No Yes Yes Yes Yes Yes Yes Yes
46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section	Yes Yes Yes No No No Yes Yes Yes Yes
46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d 49 f	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities	Yes Yes No No Yes Yes Yes Yes Yes Yes Yes
46 b 46 c 47 48 48 a 48 a1 48 b 48 b1 49 b 49 c 49 c 49 d 49 e	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit deopening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of	Yes Yes No No Yes Yes Yes Yes Yes Yes Yes
46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d 49 f	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit deopening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of	Yes Yes No No Yes Yes Yes Yes Yes Yes Yes Yes
46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d 49 f	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges	Yes Yes No No Yes Yes Yes Yes Yes Yes Yes
46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d 49 f	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or	Yes Yes No No Yes Yes Yes Yes Yes Yes Yes Yes
46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d 49 e 49 f	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes Yes No No Yes Yes Yes Yes Yes Yes Yes Yes
46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d 49 f	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Assess the risks of relationships with domestic and	Yes Yes Yes No No No Yes Yes Yes Yes Yes Yes Yes Yes
46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d 49 e 49 f	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes Yes No No Yes Yes Yes Yes Yes Yes Yes Yes
46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d 49 e 49 f	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Assess the risks of relationships with domestic and	Yes Yes Yes No No No Yes Yes Yes Yes Yes Yes Yes Yes

49 i	Define the process for escalating financial crime risk	
401	issues/potentially suspicious activity identified by	Yes
		i es
	employees	
49 j	Define the process, where appropriate, for terminating	
,	existing customer relationships due to financial crime	Yes
		163
	risk	
49 k	Define the process for exiting clients for financial	
	crime reasons that applies across the entity, including	Yes
		1.55
	foreign branches and affiliates	
49 I	Define the process and controls to identify and handle	
	customers that were previously exited for financial	l.,
	crime reasons if they seek to re-establish a	Yes
	relationship	
49 m	Outline the processes regarding screening for	l.,
	sanctions, PEPs and Adverse Media/Negative News	Yes
	-	
49 n	Outline the processes for the maintenance of internal	Yes
	"watchlists"	res
50	Has the Entity defined a risk tolerance statement or	
50		l.,
	similar document which defines a risk boundary around	Yes
	their business?	
51	Does the Entity have record retention procedures that	
	comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	I
		5 years or more
		^
		I
	Confirm that all reanances are ideal in the above 2. "	
52	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	
52 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	I
	and the branchives that this applies to.	
53	If appropriate, provide any additional information/context	
	to the answers in this section.	
	to the answers in this section.	
	1	
6. AML, C	TF & SANCTIONS RISK ASSESSMENT	
6. AML, C	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:	
	Does the Entity's AML & CTF EWRA cover the inherent	Yes
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	
54 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 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 555	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 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	Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 555	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 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 a 55 b 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	Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 a 55 b 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 a 55 b 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	Yes
54 a 54 b 54 c 54 d 55 a 55 b 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
54 a 54 b 54 c 54 d 55 c 55 d 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 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 c 55 d 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 c 55 a 55 c 55 d 55 e 55 f 55 g	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 e 55 f 55 g 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 c 55 a 55 c 55 d 55 e 55 f 55 g	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 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 55 a 55 b 55 c 55 d 55 e 55 f 55 g 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	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 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 e 55 f 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 c 55 a 55 b 55 c 55 d 55 e 55 f 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 e 55 f 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 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 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 c 55 a 55 b 55 c 55 d 55 e 55 f 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 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 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 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 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 risk components detailed below:	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 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 risk components detailed below: Client	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 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 risk components detailed below:	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 c 55 d 55 c 55 f 55 g 55 h 56 a 57 a 57 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 d 55 c 55 d 55 c 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 risk components detailed below: Client Product Channel	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 a 57 a 57 a 57 c 57 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	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 d 55 c 55 d 55 c 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 risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 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 risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 a 57 a 57 a 57 c 57 d 58	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 Geographity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 d 55 c 55 d 55 f 55 g 55 h 56 a 57 a 57 a 57 a 57 d 58 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client 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 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57 a 57 b 57 c 57 d 58 58 a 58 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 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 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57 a 57 b 57 c 57 d 58 58 a 58 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 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 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 b 57 c 57 d 58 a 58 b 58 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 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 List Management	Yes
54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 b 55 c 55 d 55 b 55 c 55 d 55 h 56 a 57 a 57 a 57 b 57 c 57 d 57 d 57 b 58 a 58 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 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
59	Has the Entity's Sanctions EWRA been completed in the	Yes
	last 12 months?	165
59 a	If N, provide the date when the last Sanctions EWRA	
	was completed.	
60	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	
60 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context	
	to the answers in this section.	
7. KYC, CD	D and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	
	CDD must be completed, e.g. at the time of onboarding	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	10%
	beneficial ownership identification?	10%
67	Does the due diligence process result in customers	Yes
	receiving a risk classification?	165
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)	
		Assesment/Evaluation of reputation, Channel for providing service (product)
60	For high risk non-individual customers, is a site visit a next	
68	For high risk non-individual customers, is a site visit a part	Yes
68 a	of your KYC process? If Y, is this at:	
	Onboarding	Yes
68 a1	KYC renewal	
68 a2	Trigger event	Yes Yes
68 a3		
68 a4	Other	No
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening	
	customers for Adverse Media/Negative News?	Yes
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

	1 =-	L.
69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	Combination of automated and manual
	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	Yes
	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	Trigger event	Yes
71 a3	What is the method used by the Entity to screen PEPs?	165
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	
13	to review and escalate potential matches from screening	
	customers and connected parties to determine whether	Yes
	they are PEPs, or controlled by PEPs?	
	they are FEFS, or controlled by FEFS?	
74	Is KYC renewed at defined frequencies based on risk	
74		Yes
74.0	rating (Periodic Reviews)?	
74 a	If yes, select all that apply:	Vac
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)	
	, , , , , , , , , , , , , , , , , , , ,	
		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
	Marijuana-related Entities	Prohibited
76 g		
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
76 I	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
	Red light businesses/Adult entertainment	Prohibited
76 r		
76 s	Regulated charities	EDD on risk-based approach
	ŭ	
76 t	Shell banks	Prohibited
76 u	Shell banks Travel and Tour Companies	EDD on risk-based approach
76 u 76 v	Shell banks Travel and Tour Companies Unregulated charities	EDD on risk-based approach EDD on risk-based approach
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Transparency etailuatus:	92		Yes
		Transparency Stanuarus!	

	Ta	
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	Law of Ukraine Law on AML/FT No. 361-IX dated 6 December 2019 No. 361-IX dd 06.12.2019 Regulations on the implementation of financial monitoring by banks, approved by Resolution of the Board of the NBU No. 65 dated 19 May 2020
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	100
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC	TIONS	
98	Does the Entity have a Sanctions Policy approved by	
90	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	Yes
102	Lists? What is the method used by the Entity for sanctions	Deth Automated and Manual
	screening? If 'automated' or 'both automated and manual'	Both Automated and Manual
102 a	selected:	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	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 transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its	
106 a	sanctions screening processes: Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106 b	United States Department of the Treasury's Office of	Head for correspond customers and handfield current and for fill-directors and to the
	Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data

106 c	Office of Financial Sanctions Implementation HMT	Not used
100.1	(OFSI)	
106 d	European Union Consolidated List (EU)	Not used
106 e	Lists maintained by other G7 member countries	Not used
106 f	Other (specify)	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, 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.	
44 TDAINI	NO A EDUCATION	
	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		I
112 e	3rd Line of Defence	Yes
	Third parties to which specific FCC activities have been outsourced	Not Applicable
112 f	Third parties to which specific FCC activities have	
	Third parties to which specific FCC activities have been outsourced	Not Applicable
112 f	Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high	Not Applicable Not Applicable
112 f 113	Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities? Does the Entity provide customised training for AML, CTF	Not Applicable Not Applicable Yes

115 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
	to the answers in this section.	
12. QUALI	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality	
	Assurance programme for financial crime (separate from	Yes
440	the independent Audit function)? Does the Entity have a program wide risk based	
118	Compliance Testing process (separate from the	Yes
	independent Audit function)?	
119	Confirm that all responses provided in the above Section	Yes
119 a	are representative of all the LE's branches If N, clarify which questions the difference/s relate to	
113 a	and the branch/es that this applies to.	
	"	
120	If appropriate, provide any additional information/context	
	to the answers in this section.	
13. AUDIT	The tree of the tree of	
121	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,	Yes
	Fraud and Sanctions policies and practices on a regular	
122	basis? How often is the Entity audited on its AML, CTF, ABC,	
122	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	
123 a	party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and	
120 a	procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes
123 d 123 e	KYC/CDD/EDD and underlying methodologies Name Screening & List Management	Yes Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j 123 k	Transaction Screening including for sanctions Training & Education	Yes Yes
123 K	Other (specify)	165
	2 3.3. (
124	Are adverse findings from internal & external audit	
	tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section	V
	are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context	
120	to the answers in this section.	
14. FRAU	JD	
127	Does the Entity have policies in place addressing fraud	Yes
	risk?	100
	B DEBT TRACE	
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	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)

JSC BANKUKRAINIAN CAPITAL

(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 orime in order to protect its reputation and to meet its legal and regulatory obligations.

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

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBODQ 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, Yevhen CHECHIL

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

LNatalia AKULOVA

MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are need to expand this declaration on behalf of the Financial Institution. omplete and correct to my h

03 hov, 2025 Yevhen CHECHIL

Nataliis AKULOVA

03 NOV , 2025 ___ (Signature & Date)