the Wolfsberg Group

Financial Institution Name: Location (Country)

BC "MAIB" S.A. Chisinau City, the Republic of Moldova

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

No#	Question	Answer
1. ENTITY	& OWNERSHIP	DECOMPOSITION OF THE PROPERTY
1	Full Legal Name	Banca comerciala "MOLDOVA-AGROINDBANK" S.A. Abbreviated Legal Name: BC "MAIB" S.A.
2	Append a list of foreign branches which are covered by this questionnaire	The bank has no foreign branches
3	Full Legal (Registered) Address	127, 31 August 1989 Street, Chisinau City, the Republic of Moldova, MD-2012
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establ/shment	27 February 1991
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	Stock Exchange of Republic of Moldova, MD14AGIB1008
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No.
6 d	Privately Owned	No
6 d1	If Y provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	No 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 branchies which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	Na
10	Name of primary financial regulator/supervisory authority	The National Bank of Moldova
11	Provide Legal Entity Identifier (LEI) if available	254900B52ULZDEBJ3043
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	N/A

3		
	Jurisdiction of licensing authority and regulator of	N/A
	ultimate parent	N/A
	,	
4	Select the business areas applicable to the Entity	
14 a		Yes
14 b		Yes
		Yes
14 c		
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f		Yes
		Yes
14 g		
14 h	Broker/Dealer	Yes
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	
/4 K	Other (please explain)	•
	1	
	D # 5 # 10 hour - in-if-new (10% or -000)	
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	No
	costoniers: (14011-163/defit fileding obstoniers binners)	No
	resident in a different jurisdiction to the location	
	where bank services are provided)	
15 a	If Y, provide the top five countries where the non-	
	resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	1001-5000
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above	Yes
	Section are representative of all the LE's branches.	165
17 a	If N, clarify which questions the difference/s relate to	
17 0	and the branch/es that this applies to.	
	and the transfers that this applies to.	
18	If appropriate, provide any additional	
10	information/context to the answers in this section.	
	information/collect to the answers in this section.	
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	CTS & SERVICES	
2. PRODU	CTS & SERVICES Does the Entity offer the following products and	
19	Does the Entity offer the following products and services:	Yes
19 19 a	Does the Entity offer the following products and services: Correspondent Banking	Yes
19 19 a 19 a1	Does the Entity offer the following products and services: Correspondent Banking If Y	Yes
19 19 a	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking	
19 19 a 19 a1	Does the Entity offer the following products and services: Correspondent Banking If Y	Yes Yes
19 a 19 a 19 a1 19 a1a	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks?	
19 19 a 19 a1	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity after Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to	
19 a 19 a 19 a1 19 a1a	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships?	Yes
19 a 19 a 19 a1 19 a1a	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures	Yes
19 a 19 a 19 a1 19 a1a	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with	Yes
19 a 19 a 19 a1 19 a1a	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures	Yes No
19 a 19 a 19 a1 19 a1a 19 a1b	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes No
19 a 19 a 19 a1 19 a1a	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking	Yes No
19 a 19 a 19 a1 19 a1a 19 a1b	Does the Entity offer the following products and services. Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks?	Yes No No
19 a 19 a 19 a1 19 a1a 19 a1b	Does the Entity offer the following products and services. Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks?	Yes No No Yes
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships	Yes No No
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks?	Yes No No Yes
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Ooes the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures	Yes No No Yes No
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Ooes the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with	Yes No No Yes
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Ooes the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures	Yes No No Yes No
19 a 19 a 1 a 19 a 1 a 1 b 19 a 1 c 19 a 1 d 19 a 1 d 19 a 1 e 19 a 1 f	Does the Entity offer the following products and services. Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks?	Yes No No Yes No
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d	Does the Entity offer the following products and services. Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Yes No No No No No No
19 a 19 a 1 a 19 a 1 a 1 b 19 a 1 c 19 a 1 d 19 a 1 d 19 a 1 e 19 a 1 f	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	Yes No No Yes No
19 a 19 a 1 a 19 a 1 a 1 b 19 a 1 c 19 a 1 d 19 a 1 d 19 a 1 e 19 a 1 f	Does the Entity offer the following products and services. Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Yes No No No No No No
19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity after Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	Yes No No No No No No
19 a 19 a 1 a 19 a 1 a 1 b 19 a 1 c 19 a 1 d 19 a 1 d 19 a 1 e 19 a 1 f	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships	Yes No No No No No No
19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	Yes No No No No No No
19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	Yes No No No No No No
19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	Yes No No No No No No
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19 c		in place to identify downstream relationships with	No
19 c	19 b		No
19 d Domestic Bulk Cash Delivery Yes 19 e Hold Mail No 19 f White Securities No 19 L Performational Coash Letter No 19 L Performat			
19 Hold Mail No		<u> </u>	
19 International Cash Later No		,	
19 Low Price Securines			
Payable Through Accounts No No No No No No No N		,	
Payment services to non-bank entities with may the order divide party payment services to their coustomers? 19 II V Py please select all that apply below? 19 II V Py please select all that apply below? 19 II V Py please select all that apply below? 19 II V Py please select all that apply below? 19 II V Py please select all that apply below? 19 II V Py please select all that apply below? 19 II V Py please select all that apply below? 19 II V Py please select all that apply below? 19 II V Py please select all that apply below? 19 II V Py please select all that apply below? 19 II V Py please select all that apply below? 19 II V Py please select all that apply below? 19 II V Py please select all that apply below? 19 II V Py please select all that apply below? 19 Py Py please select all that apply below? 19 Py Py Py please select all that apply below? 19 Py			No
thein ofter fitting party payment services to their outsiders of countries. The countries of their outsiders out			No
19 19 Third Party Payment Senoce Providers No.	19	then offer third party payment services to their	No
19 IS Virtual Asset Service Providers (VASPs) 19 IS Offier - Please explain No No No No No No No No No N	19 i1	If Y please select all that apply below?	
19 19 Virtual Asset Service Providers (VASPa) No	19 i2	Third Party Payment Service Providers	No
19	19 i3	Virtual Asset Service Providers (VASPs)	
19 19 Private Banking Domestic 19 Private Banking Domestic 19 Remote Deposit Capture (RDC) No	19 14		
19 Private Banking			
19 k Remote Deposit Capture (RDC) No		·	
Sponsoring Private ATMs			Domestic
19 m Stond Value Instruments No Trade Finance Yes 19 o Virtual Assets 19 o Virtual Assets 19 o Virtual Assets 19 o Virtual Assets 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 pt			No
19 n Trade Finance 19 p Virtual Assets 19 p For each of the following please state whether you offer the service to walk in outstomers and if so, the epiciable level of due diligence. 19 pt Check cashing service 19 pt 1 Hyes, state the applicable level of due diligence. 19 pt 2 Wire transfers 19 p2 Wire transfers 19 p3 Foreign currency conversion 19 p3 Foreign currency conversion 19 p3 Foreign currency conversion 19 p4 If yes, state the applicable level of due diligence 19 p4 Sale of Monetary Instruments 19 p4 If yes, state the applicable level of due diligence 19 p5 If you offer other services to walk in outsioners please provide more detail there, the applicable level of due diligence 19 p6 If you offer other services to walk in outsioners please provide more detail there, the applicable level of due diligence 19 p7 Other high-risk products and services identified by the Entity (please specify) 19 q Other high-risk products and services identified by the Entity (please specify) 19 q Other high-risk products and services identified by the Entity (please specify) 19 q If appropriate, provide any additional information (context to the answers in this section. 19 p3a Other high-risk products and services identified by the Entity (please specify) 19 q If appropriate, provide any additional information (context to the answers in this section. 19 p3a Oue diligence is required for transactions in cash which amount exceeds MDL 10,000 and the branchies that this applies to. 19 p3a Oue diligence is required for transactions in cash which amount exceeds MDL 10,000 information (context to the answers in this section. 19 p3a Oue diligence is required for transactions in cash which amount exceeds MDL 10,000 information (context to the answers in this section. 19 p3a Oue diligence is required for transactions in cash which amount exceeds MDL 10,000 information (context to the answers in this section. 19 p3a Oue diligence is required for transactions in cash which amount exceeds MDL 10,000 information (context to the answers	19 l	Sponsoring Private ATMs	No
19 n Trade Finance 19 o Virtual Assets 19 p o 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 19 p2 Wive transfers 19 p2 Wive transfers 19 p3 Foreign currency conversion 19 p3 Foreign currency conversion 19 p3 Foreign currency conversion 19 p4 Sale of Monetary Instruments 19 p4 If yes, state the applicable level of due diligence 19 p4 Sale of Monetary Instruments 19 p5 If yes, state the applicable level of due diligence 19 p4 Sale of Monetary Instruments 19 p5 If yes, state the applicable level of due diligence 19 p6 If you offer other services to walk-in customers 19 p7 If yes, state the applicable level of due diligence 19 p6 If you offer other services to walk-in customers 19 p7 If yes, state the applicable level of due diligence 19 p6 If you offer other services to walk-in customers 19 p6 If you offer other services to walk-in customers 19 p6 If you offer other services to walk-in customers 19 p6 If you offer other services to walk-in customers 19 p6 If you offer other services to walk-in customers 19 p6 If you offer other services to walk-in customers 19 p7 If you offer other services to walk-in customers 19 p6 If you offer other services and services identified by 19 the Entity (please specify) No 20 Confirm that all responses provided in the above 20 Section are representative of all the LE's branches. 21 If appropriate, provide any additional 22 If yes the Entity have a programme that sets minimum 23 AML, CTF & SANCTIONS PROGRAMME 24 Appointed Officer officers in this section. 19 p3a Oue diligence is required for transactions in cash which amount exceeds MDL 10,000 22 Adverse Information Screening 23 Adverse Information Screening 24 Cash Reporting 25 Adverse Information Screening 26 CDD 27 Yes 28 DD 29 CDD 29 Yes 20 DD 20 CDD 20 Yes 21 P0 Deces and Procedures 29 Yes 21 P0 Plones and Procedures 20 Yes	19 m	Stored Value Instruments	
19 p Virtual Assets No Virtual Assets No Virtual Assets Virt	19 n	Trade Finance	
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	19 o	Virtual Assets	1.00
19 pt a	19 р	offer the service to walk-in customers and if so, the	
19 pt a	19 p1	Check cashing service	No
19 p2 Wire transfers No 19 p2a If yes, state the applicable level of due diligence Pease select 19 p3 Foreign currency conversion Yes 19 p4 Sale of Monetary Instruments No 19 p4 Sale of Monetary Instruments No 19 p4 If yes, state the applicable level of due diligence 19 p5 If you offer other services to walk in customers' please provide more detail here, including describing the level of due diligence. 19 p6 Other high-risk products and services identified by the Entity (please specify) No 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 21 If appropriate, provide any additional information/context to the answers in this section. 21 If appropriate, provide any additional information/context to the answers in this section. 22 Des the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 Appointed Officer with sufficient experience/expertise Yes 22 Cash Reporting Yes 22 Cash Reporting Yes 23 Cash Reporting Yes 24 Cash Reporting Yes 25 CoDD Yes 26 CoDD Yes 27 Periodic Review Yes 28 Periodic Review Yes 29 PEP Screening PEP Screening Yes 29 PEP Screening Yes 20 PEP Screening Yes 20 PEP Screening Yes 20 PEP Screening Yes 20 PEP Screening Yes 21 Policies and Procedures Yes 22 PEP Screening Yes 23 PEP Screening Yes 24 Policies and Procedures Yes 25 PEP Screening Yes 26 PEP Screening Yes 27 PEP Screening Yes 28 PEP Screening Yes 29 PEP Screening Yes 20 PEP Screening Yes 21 Periodic Review Yes 22 Periodic Review Yes 23 Periodic Review Yes 24 Periodic Review Yes 25 Periodic Review Ye			
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Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Yes Adverse Information Screening Yes Cab Reperting Yes Cash Reporting Yes Cash Reporting Yes CDD Yes Cash Reporting Yes Independent Testing Yes Independent Testing Yes Independent Review Yes Periodic Review Yes Policies and Procedures Yes PEP Screening Yes	20 a	Section are representative of all the LE's branches. If N _s clarify which questions the difference's relate to and the branch/es that this applies to.	Yes
Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Yes Adverse Information Screening Yes Cab Reperting Yes Cash Reporting Yes Cash Reporting Yes CDD Yes Cash Reporting Yes Independent Testing Yes Independent Testing Yes Independent Review Yes Periodic Review Yes Policies and Procedures Yes PEP Screening Yes	20 a	Section are representative of all the LE's branches. If N _a clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional	
22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes 22 d Cash Reporting Yes 22 e CDD Yes 22 f EDD Yes 22 g Independent Testing Yes 22 h Periodic Review Yes 22 i Policies and Procedures Yes 22 j PEP Screening Yes	20 a	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.	
22 c Beneficial Ownership Yes 22 d Cash Reporting Yes 22 e CDD Yes 22 f EDD Yes 22 g Independent Testing Yes 22 h Periodic Review Yes 22 i Policies and Procedures Yes 22 j PEP Screening Yes	20 a 21 3. AML, CT	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:	19 p3a Oue diligence is required for transactions in cash which amount exceeds MDL 10,000
22 d Cash Reporting Yes 22 e CDD Yes 22 f EDD Yes 22 g Independent Testing Yes 22 h Periodic Review Yes 22 i Policies and Procedures Yes 22 j PEP Screening Yes	20 a 21 3. AML, CT 22	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	19 p3a Oue diligence is required for transactions in cash which amount exceeds MDL 10,000 Yes
22 e CDD Yes 22 f EDD Yes 22 g Independent Testing Yes 22 h Periodic Review Yes 22 i Policies and Procedures Yes 22 j PEP Screening Yes	20 a 21 3. AML, CT 22 22 a 22 b	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	19 p3a Oue diligence is required for transactions in cash which amount exceeds MDL 10,000 Yes
22 f EDD Yes 22 g Independent Testing Yes 22 h Periodic Review Yes 22 i Policies and Procedures Yes 22 j PEP Screening Yes	20 a 21 3. AML, CT 22 22 a 22 b 22 c	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	19 p3a-Oue diligence is required for transactions in cash which amount exceeds MDL 10,000 Yes Yes
22 f EDD Yes 22 g Independent Testing Yes 22 h Periodic Review Yes 22 i Policies and Procedures Yes 22 j PEP Screening Yes	20 a 21 3. AML, CT 22 22 a 22 b 22 c	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	19 p3a Oue diligence is required for transactions in cash which amount exceeds MDL 10,000 Yes Yes Yes
22 g Independent Testing Yes 22 h Periodic Review Yes 22 i Policies and Procedures Yes 22 j PEP Screening Yes	20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d	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	19 p3a Oue diligence is required for transactions in cash which amount exceeds MDL 10,000 Yes Yes Yes Yes
Periodic Review Yes 22 i Policies and Procedures Yes 22 j PEP Screening Yes	20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 c	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	19 p3a Oue diligence is required for transactions in cash which amount exceeds MDL 10,000 Yes Yes Yes Yes Yes Yes
22 i Policies and Procedures Yes 22 j PEP Screening Yes	20 a 21 3. AML, CT 22 22 a 22 c 22 c 22 cd 22 e 22 f	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	19 p3a Oue diligence is required for transactions in cash which amount exceeds MDL 10,000 Yes Yes Yes Yes Yes Yes Yes
22 j PEP Screening Yes	20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 c 22 d 22 e 22 f 22 g	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	19 p3a Oue diligence is required for transactions in cash which amount exceeds MDL 10,000 Yes Yes Yes Yes Yes Yes Yes
	20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g	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	19 p3a Oue diligence is required for transactions in cash which amount exceeds MDL 10,000 Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
	20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i	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 section. If appropriate 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	19 p3a-Oue diligence is required for transactions in cash which amount exceeds MDL 10,000 Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
	20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 p 22 j	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 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	19 p3a Oue diligence is required for transactions in cash which amount exceeds MDL 10,000 Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
221 Sanctions Yes	20 a	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 section. If appropriate 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	19 p3a Oue diligence is required for transactions in cash which amount exceeds MDL 10,000 Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye

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22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education Transaction Monitoring	Yes Yes
22 o 23	How many full time employees are in the Entity's	Yes
23	AML, CTF & Sanctions Compliance Department?	11-100
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Yes
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
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. ANTI	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	Not Applicable
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 c	includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	
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 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?	No
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 the net result of the controls effectiveness and the inherent risk assessment?	No ST.
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	No
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	No

40 Ь		
	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	No
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	No
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	No
40 e	Changes in business activities that may materially increase the Entity's corruption risk	No
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
42 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	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.	
E 4881 O	TE & GARGETIONS DOLLOWS & BOOKES UPTER	
5. AMIL, C	TF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c		
	Sanctions violations	Yes
47	Sanctions violations Are the Entity's policies and procedures updated at least annually?	Yes Yes
	Are the Entity's policies and procedures updated at	
47 48 48 a	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	
47 48 48 a 48 a	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
47 48 48 a 48 a1 48 b	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 Yes
48 48 a 48 a 1 48 b 48 b 1	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
48 a 48 a 48 a1 48 b 48 b1 49	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 Yes
48 a 48 a 1 48 b 48 b 1 49 a	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 Yes
48 a 48 a 48 a1 48 b 48 b1 49	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
48 a 48 a 1 48 b 48 b 1 49 49 a	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 accounts for	Yes Yes Yes Yes Yes Yes
48 a 48 a 1 48 b 48 b 1 49 a 49 b	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 Yes Yes
48 a 48 a 1 48 b 48 b 1 49 a 49 c	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 Yes Yes Yes Yes Yes
48 a 48 a 48 a 48 a1 48 b 48 b1 49 d 49 c 49 d	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	Yes
48 a 48 a 1 48 b 48 b 1 49 a 49 b 49 c 49 d 49 e	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 decling with another entity that provides services to shell banks Prohibit depening and keeping of accounts for	Yes

491	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
49 }	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
49 1	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	5 years or more
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context to the answers in this section.	-
	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the	
54	inherent risk components detailed below:	
54 a	Client	Yes
54 b	Product Channel	Yes
54 d	Geography	Yes
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	145
55 a	Transaction Monitoring	Yes
55 b	Customer Due Diligence	Yes
55 c	PEP Identification	Yes
55 d	Transaction Screening	Yes
55 e	Name Screening against Adverse Media/Negative News	Yes
55 f	Training and Education	Yes
55 g	Governance	Yes
55 h 56	Management Information Has the Entity's AML & CTF EWRA been completed	Yes Yes
56 a	in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	
57	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
57 a	Client	Yes
57 b	Product	Yes
57 c	Channel	Yes
		Yes
57 d	Geography	163
57 d 58	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
58 58 a	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
58 a 58 b	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes Yes
58 58 a	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes

58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in	i inz
33	the last 12 months?	Yes
59 a		
29 a	If N, provide the date when the last Sanctions EWRA was completed.	
	EVVIA was completed,	
60	Confirm that all responses provided in the above	Yes
	Section are representative of all the LE's branches	Tes .
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	
1	information/context to the answers in this section.	A Company of the Comp
i	mornico di and anamaia in any accomi.	•
	DD 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	Yes
	onboarding 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	
64 f	Purpose and nature of relationship	Yes
	Source of funds	Yes
64 g		Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold	
	applied to beneficial ownership identification?	25%
67	Does the due diligence process result in customers	
	receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the	
	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
		Yes
67 a6	Other (specify)	• 7
	1	
	20 10	
68	For high risk non-individual customers, is a site visit a	V.
	part of your KYC process?	Yes
68 a	If Y, is this at:	
68 a1	Onboarding	No
68 a2	KYC renewal	No
68 a3	Trigger event	Yes
68 a4	Other	No No
68 a4a	If yes, please specify "Other"	
	jee product opconj. Cont.	
69	Does the Entity have a risk based approach to	
	screening customers for Adverse Media/Negative	Yes
	News?	
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	
	Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Automated
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	No
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	No
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Restricted
76 b	Respondent Banks	Always subject to EDD
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	Always subject to EDD
76 d	Extractive industries	EDD on risk-based approach
76 e	Gambling customers	Restricted
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	Always subject to EDD
76 i	Non-account customers	EDD on risk-based approach
		Always subject to EDD
76 j	Non-Government Organisations	
76 k	Non-resident customers	Restricted
761	Nuclear power	Prohibited
76 m	Payment Service Providers	Always subject to EDD
76 n	PEPs	Always subject to EDD
76 o	PEP Close Associates	Always subject to EDD
76 p	PEP Related	Always subject to EDD
76 q	Precious metals and stones	Always subject to EDD
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	Prohibited
76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers	Prohibited Prohibited
76 y	Other (specify)	PHOLIMICA
77	If restricted, provide details of the restriction	The restrictions are applied based on the legislation's provisions or when the ML/TF risk are assessed as High
78	Does EDD require senior business management and/ or compliance approval?	Yes

-		
78 a	If Y indicate who provides the approval:	Both
79	Does the Entity have specific procedures for	
[onboarding entities that handle client money such as	Yes
1	lawyers, accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or	(4/1)
	quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above	
I	Section are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to	
014	and the branch/es that this applies to	
	and the branchies that this applies to	
	75 59	
82	If appropriate, provide any additional	27
	information/context to the answers in this section.	
	177.00	
O MONE	TORING & REPORTING	
o. MON	TORING & REPORTING	
83	Does the Entity have risk based policies, procedures	
1	and munitoring processes for the identification and	Yes
l	reporting of suspicious activity?	
	3.4	<u> </u>
84	What is the method used by the Entity to monitor	Combination of automated and manual
	Iransactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination salested assets to the	
84 a	If manual or combination selected, specify what	
	type of transactions are monitored manually	
ĺ		
.	If automated or combination selected, are internal	Vendor-sourced tools
84 b	system or vendor-sourced tools used?	Vericor-sourced todas
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is	
0-01	the name of the vendor/tool?	SIRON
	the name of the verioginoot?	
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring	< 1 year
	application last calibrated?	, · · · year
	D	-
85	Does the Entity have regulatory requirements to	Yes
	report suspicious transactions?	
	If Y, does the Entity have policies, procedures and	
85 a	processes to comply with suspicious transaction	
	reporting requirements?	Yes
	reporting requirements?	
	Describe Estituteur colision according	
86	Does the Entity have policies, procedures and	W
	processes to review and escalate matters arising from	Yes
	the monitoring of customer transactions and activity?	
87	Does the Entity have a data quality management	
•	programme to ensure that complete data for all	Yes
	transactions are subject to monitoring?	163
	mensections are subject to monitoring?	
88	Does the Entity have processes in place to respond	
	to Request For Information (RFIs) from other entities	Yes
	in a timely manner?	
89	Door the Entity hours accessed to	<u> </u>
03	Does the Entity have processes in place to send	l.,
	Requests for Information (RFIs) to their customers in a timely manner?	Yes
	<u> </u>	
90	Confirm that all responses provided in the above	Yes
	Section are representative of all the LE's branches	
90 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
91	If appropriate, provide any additional	
	information/context to the answers in this section.	•
0.041///	THE TOTAL OF STREET	
	NT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group	Yes
	Payment Transparency Standards?	

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 _c specify the regulation	The Law of preventing and combating money laundering and terrorist financing nr.308 from 22.12.2017, the Regulation on requirements for the prevention and combating of money laundering and terrorist financing in the activity of banks (NBM Decision No.200 from 09.08.2018) and other normalive acts of the NBM and local FIU related to AML/CTF field
93 c	If N _e explain	
94	Ones the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	-
10. SANC	TIONS	Year of the second of the second of
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?	Automated
102 a	If 'automated' or 'both automated and manual' 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?	1. World Check One. 2. SIRON
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 Question 110)	< 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?	Automated

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 sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional table
106 b	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 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Not used
106 f	Other (specify)	
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
110	If appropriate, provide any additional information/context to the answers in this section.	=
11. TRAINII	NG & EDUCATION	THE COMPANY OF THE PARTY OF THE
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 are representative of all the LE's branches	Yes

and the branches that this applies to. If appropriate, provide any additional minimation/controlls to the answers in this section. If appropriate provide any additional minimation of the provided of the p			
information.comiest to the answers in this section. 112. Quality Assurance programmed risk based Cutility Assurance programmed for flatenoid criting Cutility Cutil	115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
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In addition to inspections by the government supervisorsregulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? 122	120		
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128 Does the Entity have a dedicated team responsible		Does the Entity have policies in place addressing	Yes
not hiexating of defecting wongs	128		Yes

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

Declaration Statement

Wolfsberg Group Correspondent Banking Due Ditigence 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)

BC "MAIB" S.A. (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime taws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

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

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

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

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

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

Stela Recean, Deputy CEO - Risk & Compliance Area (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this work per CBDDQ are completed and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

24.01.2024 (Signature & Date)

24.01.2024

(Signature & Date)

