

	Financial Institution Name: Location (Country) :	Frankfurter Bankgesellschaft (Schweiz) AG Schweiz
model are mater branches. If a re	ially similar to the LE Head Office. This questionnaire should not cover	Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control 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 ighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client be completed for that branch.
No #	Question	Answer
1 ENTITY	& OWNERSHIP	
1	Full Legal Name	
		Frankfurter Bankgesellschaft (Schweiz) AG
2	Append a list of foreign branches which are covered by this questionnaire	n/a
3	Full Legal (Registered) Address	
		Börsenstrasse 16, 8001 Zürich, Schweiz
4	Full Primary Business Address (if different from above)	n/a
5	Date of Entity incorporation/establishment	19.01.1968
6	Select type of ownership and append an ownership chart if available	
<u>6a</u>	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	100 % Frankfurter Bankgesellschaft Holding AG
7	% of the Entity's total shares composed of bearer shares	0%
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	n/a
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	no
10	Name of primary financial regulator/supervisory authority	FINMA, Schweiz
11	Provide Legal Entity Identifier (LEI) if available	5299004UAIQGGCLBCB46
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	Frankfurter Bankgesellschaft Holding AG
13	Jurisdiction of licensing authority and regulator of ultimate parent	Deutschland
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	No
14 h	Private Banking	Yes

14 c	Commercial Banking	No
14 d	Transactional Banking	No
14 e	Investment Banking	No
14 f	Financial Markets Trading	No
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	No
14 j	Wealth Management	Yes
14 k	Other (please explain)	
		n/a
15	Does the Entity have a significant (10% or more) portfolio	
15	of non-resident customers or does it derive more than	
	10% of its revenue from non-resident customers? (Non-	Y.
	resident means customers primarily resident in a different	Yes
	jurisdiction to the location where bank services are	
	provided)	
15 a	If Y, provide the top five countries where the non-	Deutschland
	resident customers are located.	Luxemburg
		Liechtenstein USA
		Paraguay
16	Select the closest value:	
16 a	Number of employees	51-200
16 b	Total Assets	
17	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches.	No
17 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
		n/a
18	If appropriate, provide any additional information/context	
10	to the answers in this section.	
		n/a
	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	
19 818		
	services to domestic banks?	
19 a1b	services to domestic banks? Does the Entity allow domestic bank clients to	
19 a1b	Does the Entity allow domestic bank clients to	
19 a1b 19 a1c	Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in	
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19 a1c 19 a1d	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?	
19 a1c	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	
19 a1c 19 a1d 19 a1e	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?	
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19 a1c 19 a1d 19 a1e 19 a1f 19 a1g	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 allow downstream relationships with foreign banks? Does the Entity downstream relationships with foreign banks? Does the Entity downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	
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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	No
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No
19 f	International Cash Letter	Yes
-		
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then	
		No
	oner and party payment berviete to their edetermere.	NO
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	
1010		
10.	Drivete Dealine	
<u>19 j</u>	Private Banking	Both
19 k	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	Yes
19 n	Trade Finance	No
-	Virtual Assets	No
<u>19 o</u>		NO
19 p	For each of the following please state whether you	
	offer the service to walk-in customers and if so, the	
	applicable level of due diligence:	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	
	If yes, state the applicable level of due diligence If you offer other services to walk-in customers	
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<u>19 p4a</u> 19 p5 19 q 20 20 a 21 <u>3. AML, CT</u> 22	If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	n/a No branches n/a n/a
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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)? Yes 36 Does the Entity have controls in place to unoitor 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? Yes 38 a If N, provide the date when the last ABC EWRA was completed. Yes 39 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent tisk assessment? Yes 40 Does the Entity ABC EWRA cover the inherent risk components detailed below. Yes 40 a Potential lishilty created by intermediaries and other third-party providers as appropriate Yes 40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or thorough intermediaries. Yes 40 c Transactions, products or services, including those that involve state-controled entities or public officials. Yes 40 d Corruption risks associated with the countrise and industries in whi			
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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)? 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 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. Yes 39 Does the Entity is ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk components detailed below: Yes 40 Does the Entity is ABC EWRA cover the inherent risk components detailed below: Yes 40 b Corruption risks associated with the countries and other thic/party providers as appropriate Yes 40 c Transactions, products or services, including those that intorwe state-controled entities or public officials Yes 40 d Corruption risks associated with the contrites and other through intermediaties Yes 40 d Corruption risks associated with the contrites or public officials Yes 40 d Corruption risks associated with the contrites or public officials Yes <t< th=""><th>35 b</th><th></th><th>Yes</th></t<>	35 b		Yes
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40 a Potential liability created by intermediaries and other third-party providers as appropriate Yes 40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Yes 40 c Transactions, products or services, including those that involve state-controlled entities or public officials Yes 40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political Yes	40		
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40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Yes 40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials Yes 40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political Yes	40 d		Yes
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40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials Yes 40 d Corruption risks associated with gifts and hospitality, hirring/internships, charitable donations and political Yes		industries in which the Entity does business, directly or	Yes
that involve state-owned or state-controlled entities or public officials Yes 40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political Yes	40 c		
public officials 40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political Yes	4U C		Yes
hiring/internships, charitable donations and political Yes		public officials	
	40 d		
Controlation			Yes
		contributions	

40 e	Changes in business activities that may materially	,
	increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	No
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	No branches
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	n/a
45	If appropriate, provide any additional information/context to the answers in this section.	n/a
5. AML, C	TF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	No
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	Yes
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes

49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by	Yes
	employees	
49 j	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	
40 K	crime reasons that applies across the entity, including foreign branches and affiliates	Yes
49 I	Define the process and controls to identify and handle	
	customers that were previously exited for financial	No.
	crime reasons if they seek to re-establish a	Yes
	relationship	
49 m	Outline the processes regarding screening for	
	sanctions, PEPs and Adverse Media/Negative News	Yes
40	Outline the processes for the maintenance of internal	
49 n	"watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or	
50	similar document which defines a risk boundary around	Yes
	their business?	165
51	Does the Entity have record retention procedures that	
51	comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	
JIa	in 1, 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	No branches
52 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
		n/a
53	If appropriate, provide any additional information/context	
53	to the answers in this section.	
	to the answers in this section.	
6. AML, CTF	& SANCTIONS RISK ASSESSMENT	
	& SANCTIONS RISK ASSESSMENT	
6. AML, CTF 54	Does the Entity's AML & CTF EWRA cover the inherent	
54		Yes
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Yes Yes
54 54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes
54 54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Yes
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
54 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 54 a 54 b 54 c 54 d 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes Yes
54 54 a 54 b 54 c 54 d 55 55 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	Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 55 55 a 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:	Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 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
54 54 b 54 c 54 d 55 55 a 55 b 55 b 55 c 55 c 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 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
54 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative	Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 c 55 a 55 a 55 a 55 b 55 c 55 d 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	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 n 55 n 55 s 55 s 55 a 55 d 55 c 55 c 55 d 55 c 55 d 55 c 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 d 55 c 55 d 55 c 55 d 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 Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 n 55 n 55 s 55 s 55 a 55 d 55 c 55 c 55 d 55 c 55 d 55 c 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 d 55 c 55 d 55 c 55 d 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 Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 d 55 c 55 d 55 c 55 d 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 Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 d 55 d 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 EWRA was completed.	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 d 55 c 55 d 55 c 55 d 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 EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 a 55 a 55 a 55 c 55 c 55 d 55 c 55 d 55 f 55 f 55 h 56 a 57	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 s 55 c 55 s 55 c 55 s 55 c 55 s 55 c 55 a 55 c 55 c 57	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
54 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 d 55 c 55 d 56 d 56 d 56 d 56 d 56 d 56 d 56 d 57 d 57 d 57 d 57 d 55 c 55 d 56 d 57	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes Y
54 54 a 54 b 54 c 54 d 55 a 55 a 55 c 55 c 57 c 57 c 57 c 57 c 57 c 57 c 57 c 57 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	Yes Y
54 54 b 54 c 54 d 55 55 b 55 c 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 f 55 f 56 56 57 57 a 57 c 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 Y
54 54 a 54 b 54 c 54 d 55 a 55 a 55 c 55 c 57 c 57 c 57 c 57 c 57 c 57 c 57 c 57 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	Yes Y
54 54 b 54 b 54 c 54 d 55 a 55 b 55 c 55 d 56 a 57 57 a 57 b 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 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
54 54 b 54 c 54 d 55 a 55 b 55 c 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 d 55 f 55 f 56 56 57 57 a 57 b 57 c 57 d 58 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 Y
54 54 54 54 54 54 54 54 54 54 54 54 54 54 54 54 54 54 55 55 55 55 55 55 55 55 55 55 55 55 55 55 56 57 57 57 57 57 57 58 58 58 58 58 57 58 57 58 57 58 57 57 58 <th>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</th> <th>Yes Yes Y</th>	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 Y
54 54 b 54 c 54 d 55 a 55 b 55 c 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 d 55 f 55 f 56 56 57 57 a 57 b 57 c 57 d 58 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 Y

58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
	Has the Entity's Sanctions EWRA been completed in the	
59		Yes
	last 12 months?	
59 a	If N, provide the date when the last Sanctions EWRA	
	was completed.	
	was completed.	
60	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	No branches
60 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
		n/a
61	If appropriate, provide any additional information/context	
	to the answers in this section.	
		n/a
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	
04		
	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
		165
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
		165
66	What is the Entity's minimum (lowest) threshold applied to	Other (Specify the percentage)
	beneficial ownership identification?	other (opecity the percentage)
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
<u>67 a2</u>	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
-	Adverse Information	Yes
67 a5		Tes
67 a6	Other (specify)	
		AuM
68	For high risk non-individual customers, is a site visit a part	Yes
	of your KYC process?	
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
	Other	No
<u>68 a4</u>		NU
68 a4a	If yes, please specify "Other"	
	Desethe Futite bases a sight hard a state of the state of	
69	Does the Entity have a risk based approach to screening	
	customers for Adverse Media/Negative News?	Yes
60.0	If V is this at:	
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	Yes
	they are PEPs, or controlled by PEPs?	1 65
<u>71 a</u>	If Y, is this at:	
<u>71 a1</u>	Onboarding	Yes
<u>71 a2</u>	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes	
	to review and escalate potential matches from screening	
	customers and connected parties to determine whether	Yes
	they are PEPs, or controlled by PEPs?	
74	Is KYC renewed at defined frequencies based on risk	Yes
	rating (Periodic Reviews)?	
74 a	If yes, select all that apply:	
74 a1	Less than one year	
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	
74 a4	5 years or more	
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
	33	
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	Do not have this category of customer or industry
76 h	Respondent Banks	Always subject to EDD
76 b	Respondent Banks	Always subject to EDD
<u>76 b</u> 76 b1	If EDD or restricted, does the EDD assessment	
	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg	Always subject to EDD Yes
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 b1 76 c	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates	Yes Do not have this category of customer or industry
76 b1 76 c 76 d	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries	Yes Do not have this category of customer or industry Do not have this category of customer or industry
76 b1 76 c 76 d 76 e	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg <u>Correspondent Banking Principles 2022?</u> Embassies/Consulates Extractive industries Gambling customers	Yes Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD
76 b1 76 c 76 d 76 e 76 f	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies	Yes Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Do not have this category of customer or industry
76 b1 76 c 76 d 76 e 76 f 76 g	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities	Yes Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Do not have this category of customer or industry Do not have this category of customer or industry
76 b1 76 c 76 d 76 e 76 f 76 g 76 h	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies	Yes Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Do not have this category of customer or industry
76 b1 76 c 76 d 76 e 76 f 76 g	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers	Yes Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry
76 b1 76 c 76 d 76 e 76 f 76 g 76 h 76 h 76 i	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers	Yes Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry
76 b1 76 c 76 d 76 e 76 f 76 g 76 h 76 h 76 i 76 j	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg <u>Correspondent Banking Principles 2022?</u> Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations	Yes Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Always subject to ED Always subject to
76 b1 76 c 76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 j 76 k	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-account customers Non-covernment Organisations Non-resident customers	Yes Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Always subject to EDD Always subject to EDD
76 b1 76 c 76 d 76 e 76 f 76 h 76 i 76 i 76 k 76 l	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power	Yes Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Always subject to EDD Do not have this category of customer or industry Do not have this category
76 b1 76 c 76 d 76 f 76 g 76 h 76 j 76 m	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers	Yes Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Always subject to EDD Do not have this category of customer or industry Do not have this category
76 b1 76 c 76 d 76 e 76 f 76 f 76 h 76 h 76 i 76 i 76 k 76 i 76 k 76 i 76 k 76 n	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-account Customers Non-resident customers Nuclear power Payment Service Providers PEPs	Yes Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Do not have this category of customer or industry Always subject to EDD
76 b1 76 c 76 d 76 e 76 f 76 h 76 i 76 i 76 k 76 l 76 m 76 n 76 o	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-account Customers Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates	Yes Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Always subject to EDD Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD
76 b1 76 c 76 d 76 f 76 f 76 i 76 i 76 i 76 k 76 n 76 n 76 n 76 n 76 n 76 o 76 p	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambing customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-account customers Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Close Associates PEP Related	Yes Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Always subject to EDD Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD
76 b1 76 c 76 d 76 f 76 f 76 h 76 i 76 n 76 o 76 p 76 q	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-account customers Non-covernment Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones	Yes Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Always subject to EDD Always subject to EDD Do not have this category of customer or industry Do not have this category
76 b1 76 c 76 d 76 f 76 f 76 f 76 j 76 n 76 o 76 q 76 r	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambing customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-account customers Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks	Yes Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Do not have this category of customer or industry Always subject to EDD Always subject to EDD Always subject to EDD Always subject to EDD Do not have this category of customer or industry Do not have this category of cus
76 b1 76 c 76 d 76 f 76 f 76 h 76 i 76 i 76 i 76 k 76 n 76 n 76 n 76 q 76 q 76 n 76 q 76 r 76 s	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-account customers Non-covernment Organisations Non-resident customers Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies	Yes Do not have this category of customer or industry Do not have this category of customer or i
76 b1 76 c 76 d 76 f 76 f 76 i 76 i 76 i 76 i 76 i 76 i 76 n 76 n	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambing customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-account customers Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks	Yes Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Always subject to EDD Always subject to EDD Always subject to EDD Do not have this category of customer or industry Do not have this category of cus
76 b1 76 c 76 d 76 f 76 f 76 h 76 i 76 c 76 n 76 n 76 q 76 q 76 r 76 s 76 u	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-account customers Non-account customers Non-resident customers Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers	Yes Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Always subject to EDD Always subject to EDD Always subject to EDD Do not have this category of customer or industry Do n
76 b1 76 c 76 d 76 f 76 f 76 h 76 i 76 n 76 n 76 o 76 o 76 q 76 s 76 u 76 v	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-account customers Non-account customers Non-resident customers Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities	Yes Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Always subject to EDD Always subject to EDD Always subject to EDD Do not have this category of customer or industry Do not have this category of cus
76 b1 76 c 76 d 76 f 76 n 76 q 76 q 76 r 76 s 76 t 76 v 76 w	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-account customers Non-account customers Non-resident customers Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers	Yes Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Always subject to EDD Always subject to EDD Always subject to EDD Do not have this category of customer or industry Do n
76 b1 76 c 76 d 76 f 76 f 76 i 76 i 76 i 76 i 76 n 76 n 76 n 76 n 76 q 76 q 76 q 76 s 76 t 76 v 76 w 76 x	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambing customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-account customers Non-covernment Organisations Non-resident customers Nuclear power Payment Service Providers PEP Close Associates PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Yes Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Always subject to EDD Always subject to EDD Always subject to EDD Do not have this category of customer or industry Do n
76 b1 76 c 76 d 76 f 76 f 76 f 76 i 76 i 76 i 76 i 76 n 76 n 76 n 76 q 76 q 76 s 76 t 76 v 76 v 76 v	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambing customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-account customers Non-covernment Organisations Non-resident customers Nuclear power Payment Service Providers PEP Close Associates PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Yes Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Always subject to EDD Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Always subject to EDD Always subject to EDD Always subject to EDD Do not have this category of customer or industry Do not have this category of customer or industry
76 b1 76 c 76 d 76 f 76 f 76 f 76 i 76 i 76 i 76 k 76 n 76 n 76 n 76 q 76 q 76 s 76 t 76 v 76 v 76 v	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambing customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-account customers Non-covernment Organisations Non-resident customers Nuclear power Payment Service Providers PEP Close Associates PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Yes Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Always subject to EDD Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Always subject to EDD Always subject to EDD Always subject to EDD Do not have this category of customer or industry Do not have this category of customer or industry
76 b1 76 c 76 d 76 f 76 g 76 h 76 j 76 k 76 n 76 n 76 q 76 q 76 r 76 s 76 u 76 v 76 x 76 y	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-account customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Yes Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Always subject to EDD Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Always subject to EDD Always subject to EDD Always subject to EDD Do not have this category of customer or industry Do not have this category of customer or industry
76 b1 76 c 76 d 76 f 76 f 76 f 76 i 76 i 76 i 76 k 76 n 76 n 76 n 76 q 76 q 76 s 76 t 76 v 76 v 76 v	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambing customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-account customers Non-covernment Organisations Non-resident customers Nuclear power Payment Service Providers PEP Close Associates PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Yes Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Always subject to EDD Always subject to EDD Always subject to EDD Do not have this category of customer or industry Do n
76 b1 76 c 76 d 76 f 76 g 76 h 76 j 76 k 76 n 76 n 76 q 76 q 76 r 76 s 76 u 76 v 76 x 76 y	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-account customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Yes Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Always subject to EDD Always subject to EDD Always subject to EDD Do not have this category of customer or industry Do n
76 b1 76 c 76 d 76 f 76 g 76 h 76 j 76 k 76 n 76 n 76 q 76 q 76 r 76 s 76 u 76 v 76 x 76 y	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-account customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Yes Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Always subject to EDD Always subject to EDD Always subject to EDD Do not have this category of customer or industry Do n
76 b1 76 d 76 f 76 g 76 t 76 v 76 x 76 y	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Yes Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Always subject to EDD Always subject to EDD Always subject to EDD Do not have this category of customer or industry Do n
76 b1 76 c 76 d 76 f 76 f 76 h 76 i 76 n 76 n 76 q 76 q 76 q 76 t 76 v 76 v 76 x 76 y	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-account customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Yes Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Always subject to EDD Always subject to EDD Always subject to EDD Always subject to EDD Do not have this category of customer or industry Do n

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 lawyers,	Yes
	accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or quality	Yes
	review on clients subject to EDD?	
81	Confirm that all responses provided in the above Section	No branches
81 a	are representative of all the LE's branches If N, clarify which guestions the difference/s relate to	
01 a	and the branch/es that this applies to	
		n/a
82	If appropriate, provide any additional information/context	
02	to the answers in this section.	
		n/a
	RING & REPORTING	
	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting	Yes
	of suspicious activity?	165
84	What is the method used by the Entity to monitor	
-	transactions for suspicious activities?	Automated
84 a	If manual or combination selected, specify what type	
	of transactions are monitored manually	
84 b	If automated or combination selected, are internal	Internal System
	system or vendor-sourced tools used?	
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is	
	the name of the vendor/tool?	
84 b2	When was the tool last updated?	1-2 years
84 b3	When was the automated Transaction Monitoring	1-2 years
	application last calibrated?	,
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and	
	processes to comply with suspicious transaction	Yes
	reporting requirements?	
86	Does the Entity have policies, procedures and processes	
	to review and escalate matters arising from the	Yes
	monitoring of customer transactions and activity?	
87		
0.	Does the Entity have a data quality management	
01	Does the Entity have a data quality management programme to ensure that complete data for all	Yes
	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to	
	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a	
88	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a	
88	Does the Entity have a data quality management programme to ensure that complete data for all <u>transactions are subject to monitoring?</u> Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a <u>timely manner?</u> Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
88	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section	Yes
88 89 90	Does the Entity have a data quality management programme to ensure that complete data for all <u>transactions are subject to monitoring?</u> Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a <u>timely manner?</u> Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a <u>timely manner?</u> Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
88	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to	Yes
88 89 90	Does the Entity have a data quality management programme to ensure that complete data for all <u>transactions are subject to monitoring?</u> Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a <u>timely manner?</u> Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a <u>timely manner?</u> Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
88 89 90	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to	Yes Yes No branches
88 89 90 90 a	Does the Entity have a data quality management programme to ensure that complete data for all <u>transactions are subject to monitoring?</u> Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a <u>timely manner?</u> Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a <u>timely manner?</u> 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	Yes Yes No branches
88 89 90	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to If appropriate, provide any additional information/context	Yes Yes No branches
88 89 90 90 a	Does the Entity have a data quality management programme to ensure that complete data for all <u>transactions are subject to monitoring?</u> Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a <u>timely manner?</u> Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a <u>timely manner?</u> 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	Yes Yes No branches
88 89 90 90 a	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to If appropriate, provide any additional information/context	Yes Yes No branches n/a
88 89 90 90 a 91	Does the Entity have a data quality management programme to ensure that complete data for all <u>transactions are subject to monitoring?</u> Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a <u>timely manner?</u> Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a <u>timely manner?</u> Confirm that all responses provided in the above Section <u>are representative of all the LE's branches</u> If N, clarify which questions the difference/s relate to and the branch/es that this applies to If appropriate, provide any additional information/context to the answers in this section.	Yes Yes No branches n/a
88 89 90 90 a 91 91 9. PAYMEN	Does the Entity have a data quality management programme to ensure that complete data for all <u>transactions are subject to monitoring?</u> Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a <u>timely manner?</u> Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a <u>timely manner?</u> 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.	Yes Yes No branches n/a n/a
88 89 90 90 a 91 91 9. PAYMEN	Does the Entity have a data quality management programme to ensure that complete data for all <u>transactions are subject to monitoring?</u> Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a <u>timely manner?</u> Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a <u>timely manner?</u> Confirm that all responses provided in the above Section <u>are representative of all the LE's branches</u> If N, clarify which questions the difference/s relate to and the branch/es that this applies to If appropriate, provide any additional information/context to the answers in this section.	Yes Yes No branches n/a

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	Schweizer GWG-Regelungen für den Zahlungsverkehr
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 are representative of all the LE's branches	No branches
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	n/a
97	If appropriate, provide any additional information/context to the answers in this section.	n/a
10. SANCT	IONS	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Both Automated and Manual
102 a	If 'automated' or 'both automated and manual' selected:	
<u>102 a1</u> 102 a1a	Are internal system of vendor-sourced tools used? If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Vendor-sourced tools FINASTRA
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	1-2 years
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 (i.e. reference data)
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners (i.e. reference data)
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Not used

106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners (i.e. reference data)
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners (i.e. reference data)
106 f	Other (specify)	SECO-Listen
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	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	No branches
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	n/a
110	If appropriate, provide any additional information/context to the answers in this section.	n/a
11. TRAININ	IG & 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
<u>111 f</u>	Fraud	Yes
112	Is the above mandatory training provided to :	
<u>112 a</u>	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
<u>112 d</u> 112 e	3rd Line of Defence Third parties to which specific FCC activities have	No
	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	No branches

115 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
		n/a
116	If appropriate, provide any additional information/context	
116	to the answers in this section.	
	to the answers in this section.	n/a
12. QUAL	ITY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality	
	Assurance programme for financial crime (separate from	Yes
	the independent Audit function)?	
118	Does the Entity have a program wide risk based	
	Compliance Testing process (separate from the	Yes
	independent Audit function)?	
119	Confirm that all responses provided in the above Section	No branches
	are representative of all the LE's branches	
119 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
		n/a
120	If appropriate, provide any additional information/context	
120	to the answers in this section.	
	10 the dilowers in this section.	n/a
13. AUDIT		
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	
	basis?	
122	How often is the Entity audited on its AML, CTF, ABC,	
	Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Component based reviews
122 b	External Third Party	18 months
123	Does the internal audit function or other independent third	
	party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and	· ·
	procedures	Yes
123 b	Enterprise Wide Risk Assessment	
123 c	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123	Other (specify)	
124	Are adverse findings from internal & external audit	
	tracked to completion and assessed for adequacy and	Yes
	completeness?	
125	Confirm that all responses provided in the above section	No branches
	are representative of all the LE's branches	
125 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
		n/a
126	If appropriate, provide any additional information/context	
120		
	to the answers in this section	
	to the answers in this section.	n/a
	to the answers in this section.	n/a
		n/a
14. FRAI		n/a
14. FRAI		
	UD Does the Entity have policies in place addressing fraud risk?	n/a Yes
	UD Does the Entity have policies in place addressing fraud risk? Does the Entity have a dedicated team responsible for	Yes
127	UD Does the Entity have policies in place addressing fraud risk?	

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?	Νο
131	Confirm that all responses provided in the above section are representative of all the LE's branches	No branches
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	n/a
132	If appropriate, provide any additional information/context to the answers in this section.	n/a

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)

Frankfurter Bankgesellschaft (schweiz) AG is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

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

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

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

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

I, Andrea Dankert (COO), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

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

25.02.2025

(Signature & Date)

25.02.2025 _____ (Signature & Date)