



Financial Institution Name:

Location (Country) :

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| No #                             | Question  | Answer |
|----------------------------------|---|--------|
| <b>1. ENTITY &amp; OWNERSHIP</b> |   |        |
| 1                                | Full Legal Name   |        |
| 2                                | Append a list of branches which are covered by this questionnaire                                 |        |
| 3                                | Full Legal (Registered) Address   |        |
| 4                                | Full Primary Business Address (if different from above)   |        |
| 5                                | Date of Entity incorporation / establishment  |        |
| 6                                | Select type of ownership and append an ownership chart if available                               |        |
| 6 a                              | Publicly Traded (25% of shares publicly traded)   |        |
| 6 a1                             | If Y, indicate the exchange traded on and ticker symbol   |        |
| 6 b                              | Member Owned / Mutual   |        |
| 6 c                              | Government or State Owned by 25% or more  |        |
| 6 d                              | Privately Owned   |        |
| 6 d1                             | If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more |        |
| 7                                | % of the Entity's total shares composed of bearer shares  |        |
| 8                                | Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?        |        |
| 8 a                              | If Y, provide the name of the relevant branch/es which operate under an OBL                       |        |

| <b>2. AML, CTF &amp; SANCTIONS PROGRAMME</b> |  |  |
|--|--|--|
| <b>9</b>                                     | Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  |  |
| <b>9 a</b>                                   | Appointed Officer with sufficient experience / expertise   |  |
| <b>9 b</b>                                   | Cash Reporting   |  |
| <b>9 c</b>                                   | CDD  |  |
| <b>9 d</b>                                   | EDD  |  |
| <b>9 e</b>                                   | Beneficial Ownership   |  |
| <b>9 f</b>                                   | Independent Testing  |  |
| <b>9 g</b>                                   | Periodic Review  |  |
| <b>9 h</b>                                   | Policies and Procedures  |  |
| <b>9 i</b>                                   | Risk Assessment  |  |
| <b>9 j</b>                                   | Sanctions  |  |
| <b>9 k</b>                                   | PEP Screening  |  |
| <b>9 l</b>                                   | Adverse Information Screening  |  |
| <b>9 m</b>                                   | Suspicious Activity Reporting  |  |
| <b>9 n</b>                                   | Training and Education   |  |
| <b>9 o</b>                                   | Transaction Monitoring   |  |
| <b>10</b>                                    | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?   |  |
| <b>11</b>                                    | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?   |  |
| <b>11 a</b>                                  | If Y, provide further details  |  |
| <b>3. ANTI BRIBERY &amp; CORRUPTION</b>      |  |  |
| <b>12</b>                                    | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption? |  |
| <b>13</b>                                    | Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?  |  |
| <b>14</b>                                    | Does the Entity provide mandatory ABC training to:   |  |
| <b>14 a</b>                                  | Board and Senior Committee Management  |  |
| <b>14 b</b>                                  | 1st Line of Defence  |  |
| <b>14 c</b>                                  | 2nd Line of Defence  |  |
| <b>14 d</b>                                  | 3rd Line of Defence  |  |
| <b>14 e</b>                                  | 3rd parties to which specific compliance activities subject to ABC risk have been outsourced   |  |
| <b>14 f</b>                                  | Non-employed workers as appropriate (contractors / consultants)  |  |

| <b>4. POLICIES &amp; PROCEDURES</b> |  |  |
|-------------------------------------|--|--|
| <b>15</b>                           | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:     |  |
| <b>15 a</b>                         | Money laundering   |  |
| <b>15 b</b>                         | Terrorist financing  |  |
| <b>15 c</b>                         | Sanctions violations   |  |
| <b>16</b>                           | Does the Entity have policies and procedures that:   |  |
| <b>16 a</b>                         | Prohibit the opening and keeping of anonymous and fictitious named accounts  |  |
| <b>16 b</b>                         | Prohibit the opening and keeping of accounts for unlicensed banks and / or NBFIs   |  |
| <b>16 c</b>                         | Prohibit dealing with other entities that provide banking services to unlicensed banks   |  |
| <b>16 d</b>                         | Prohibit accounts / relationships with shell banks   |  |
| <b>16 e</b>                         | Prohibit dealing with another Entity that provides services to shell banks   |  |
| <b>16 f</b>                         | Prohibit opening and keeping of accounts for Section 311 designated entities   |  |
| <b>16 g</b>                         | 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 |  |
| <b>16 h</b>                         | Assess the risks of relationships with PEPs, including their family and close associates   |  |
| <b>16 i</b>                         | Define escalation processes for financial crime risk issues  |  |
| <b>16 j</b>                         | Specify how potentially suspicious activity identified by employees is to be escalated and investigated  |  |
| <b>16 k</b>                         | Outline the processes regarding screening for sanctions, PEPs and negative media   |  |
| <b>17</b>                           | Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?   |  |
| <b>18</b>                           | Does the Entity have a record retention procedures that comply with applicable laws?   |  |
| <b>18 a</b>                         | If Y, what is the retention period?  |  |

| 5. KYC, CDD and EDD |  |     |
|---------------------|--|-----|
| 19                  | Does the Entity verify the identity of the customer?   |     |
| 20                  | Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days   |     |
| 21                  | Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:   |     |
| 21 a                | Ownership structure  |     |
| 21 b                | Customer identification  |     |
| 21 c                | Expected activity  |     |
| 21 d                | Nature of business / employment  |     |
| 21 e                | Product usage  |     |
| 21 f                | Purpose and nature of relationship   |     |
| 21 g                | Source of funds  |     |
| 21 h                | Source of wealth   |     |
| 22                  | Are each of the following identified:  |     |
| 22 a                | Ultimate beneficial ownership  |     |
| 22 a1               | Are ultimate beneficial owners verified?   |     |
| 22 b                | Authorised signatories (where applicable)  |     |
| 22 c                | Key controllers  |     |
| 22 d                | Other relevant parties   |     |
| 23                  | Does the due diligence process result in customers receiving a risk classification?  |     |
| 24                  | Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?   |     |
| 25                  | Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? |     |
| 26                  | Does the Entity have a process to review and update customer information based on:   |     |
| 26 a                | KYC renewal  |     |
| 26 b                | Trigger event  |     |
| 27                  | 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?  | Yes |
| 27 a                | Non-account customers  |     |
| 27 b                | Offshore customers   |     |

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|       |   |  |
|-------|---|--|
| 27 c  | Shell banks   |  |
| 27 d  | MVTS/ MSB customers   |  |
| 27 e  | PEPs  |  |
| 27 f  | PEP Related   |  |
| 27 g  | PEP Close Associate   |  |
| 27 h  | Correspondent Banks   |  |
| 27 h1 | If EDD or EDD & Restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014? |  |
| 27 i  | Arms, defense, military   |  |
| 27 j  | Atomic power  |  |
| 27 k  | Extractive industries   |  |
| 27 l  | Precious metals and stones  |  |
| 27 m  | Unregulated charities   |  |
| 27 n  | Regulated charities   |  |
| 27 o  | Red light business / Adult entertainment  |  |
| 27 p  | Non-Government Organisations  |  |
| 27 q  | Virtual currencies  |  |
| 27 r  | Marijuana   |  |
| 27 s  | Embassies / Consulates  |  |
| 27 t  | Gambling  |  |
| 27 u  | Payment Service Provider  |  |
| 27 v  | Other (specify)   |  |
| 28    | If restricted, provide details of the restriction   |  |

| <b>6. MONITORING &amp; REPORTING</b> |   |  |
|--------------------------------------|---|--|
| 29                                   | Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?                |  |
| 30                                   | What is the method used by the Entity to monitor transactions for suspicious activities?  |  |
| 30 a                                 | Automated   |  |
| 30 b                                 | Manual  |  |
| 30 c                                 | Combination of automated and manual   |  |
| 31                                   | Does the Entity have regulatory requirements to report currency transactions?   |  |
| 31 a                                 | If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements?   |  |
| 32                                   | Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? |  |
| <b>7. PAYMENT TRANSPARENCY</b>       |   |  |
| 33                                   | Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?   |  |
| 34                                   | Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:                 |  |
| 34 a                                 | FATF Recommendation 16  |  |
| 34 b                                 | Local Regulations   |  |
| 34 b1                                | Specify the regulation  |  |
| 34 c                                 | If N, explain   |  |

| <b>8. SANCTIONS</b>                |  |  |
|------------------------------------|--|--|
| 35                                 | 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? |  |
| 36                                 | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?  |  |
| 37                                 | Select the Sanctions Lists used by the Entity in its sanctions screening processes:  |  |
| 37 a                               | Consolidated United Nations Security Council Sanctions List (UN)   |  |
| 37 b                               | United States Department of the Treasury's Office of Foreign Assets Control (OFAC)   |  |
| 37 c                               | Office of Financial Sanctions Implementation HMT (OFSI)  |  |
| 37 d                               | European Union Consolidated List (EU)  |  |
| 37 e                               | Other (specify)  |  |
| 38                                 | Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries / regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?   |  |
| <b>9. TRAINING &amp; EDUCATION</b> |  |  |
| 39                                 | Does the Entity provide mandatory training, which includes :   |  |
| 39 a                               | Identification and reporting of transactions to government authorities   |  |
| 39 b                               | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  |  |
| 39 c                               | Internal policies for controlling money laundering, terrorist financing and sanctions violations   |  |
| 39 d                               | New issues that occur in the market, e.g., significant regulatory actions or new regulations   |  |
| 40                                 | Is the above mandatory training provided to :  |  |
| 40 a                               | Board and Senior Committee Management  |  |
| 40 b                               | 1st Line of Defence  |  |
| 40 c                               | 2nd Line of Defence  |  |
| 40 d                               | 3rd Line of Defence  |  |
| 40 e                               | 3rd parties to which specific FCC activities have been outsourced  |  |
| 40 f                               | Non-employed workers (contractors / consultants)   |  |
| <b>10. AUDIT</b>                   |  |  |
| 41                                 | 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 and Sanctions policies and practices on a regular basis?                      |  |