the Wolfsberg Group

Financial Institution Name: Location (Country):

Banco de Fomento Angola, S.A.	
Angola	

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the GBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches, insterially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

1. FNT	# Question	Answer
1		
t	Full Legal Name	
		Banco de Fomento Angola, S A.
2	Append a list of foreign branches which are covered by	
	this questionnaire	
	4222401110112	N/A
		N/A
3	Full Legal (Registered) Address	
•	an Edge: Medisioned/ Additions	
		Rua Amilicar Cabrel nº 58 Maianga Luanda
4	5.15	
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	
-		
		TOT LINE
		26/jul/08
6	Select type of ownership and append an ownership char	
	if available	
6 a	Dublish Traded (251) at the second of the	
	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	
		N/A
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	TVU
	Soveriment of State Covined by 25% of 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	I INITIAL TO A TABLE
		UNITEL S.A 51 9%
		BPI S.A48,1%
7	% of the Entity's total shares composed of bearer shares	
•	is of the Entity's total shares composed of bearer shares	
		N/A
3	Does the Entity, or any of its branches, operate under an	
	Offshore Banking License (OBL)?	No
a	If Y, provide the name of the relevant branch/es	
	which operate under an OBL	
		Ave
		N/A
	Participants at the second	
	Does the Bank have a Virtual Bank License or provide	
	services only through online channels?	no e
0	Name of primary financial regulator/supervisory authority	
191.	gamensuporticely dunionly	
		B
		Banco Nacional de Angola
	n	
1	Provide Legal Entity Identifier (LEI) if available	
	The same of the sa	
		13800KUXN7BIRCF102
2	Provide the full legal name of the ultimate narror of	
2	Provide the full legal name of the ultimate parent (if	
ľ	different from the Entity completing the DDQ)	N/A
1	different from the Entity completing the DDQ)	WA

3	Jurisdiction of licensing authority and regulator of	
3		
	uttimate parent	N/A
4	Select the business areas applicable to the Entity	
_		Yes
4 a	Cortan Constitute	Yes
4 b	1 II tale Galling	Yes
4 c	Continue Continue	
4 d	Training Committee	Yes
4 e	HIVE SUITE IN DAILY.	No .
4 f		No
4 g	Securities Services/Custody	No
4 h	Broker/Dealer	No .
41		No
		No
4]	TT COUNTY TO THE TOTAL THE TOTAL TO THE TOTAL THE TOTAL TO THE TOTAL THE TOTAL TO T	
14 k	Other (please explain)	
		Tordy Nivers Indian activities
		Trade Finance, lending activities
	S	
15	Does the Entity have a significant (10% or more) portfolio	
	of non-resident customers or does it derive more than	
	10% of its revenue from non-resident customers? (Non-	No
	resident means customers primarily resident in a	· ·
	different jurisdiction to the location where bank services	
	are provided)	
15 a	If Y, provide the top five countries where the non-	
	resident customers are located.	
	(03/34:11 000/01/01 01 01 01 01 01 01	N/A
16	Select the closest value:	
	Number of employees	1001-5000
16 a		Greater than \$500 million
16 b	Total Assets	Greater graft 5500 million
17	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	
17 a	If N, clarify which questions the difference/s relate to	
17 8	and the branch/es that this applies to.	
	and the prancines that the applies to:	N/A
18	If appropriate, provide any additional information/context	
	to the answers in this section.	
	ID BIG BIGHOIS AT THE BECKEN.	N/A
2 PPOD	UCTS & SERVICES	
	Does the Entity offer the following products and services:	
19	Does the Elling one: the latering product and activities	
19 a	Correspondent Banking	No
	If Y	
19 a1	Does the Entity offer Correspondent Banking	
19 a1a	Does the Entity oner Correspondent partiting	No
	and the demonstration bearings	
	services to domestic banks?	
19 a1b	services to domestic banks? Does the Entity allow domestic bank clients to	No
19 a1b	provide downstream relationships? Services to domestic bank clients to provide downstream relationships?	
19 a1b	services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in	
distance in	services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with	
distance in	services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	
19 a1c	services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking	Yes
distance in	services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks?	
19 a1c	services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks?	Yes No
19 a1c	services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks?	Yes No No
19 a1c 19 a1d 19 a1e	services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks?	Yes No No
19 a1c	pervices to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in the procedur	Yes No No
19 a1c 19 a1d 19 a1e	poes the Entity allow domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with	Yes No No
19 a1c 19 a1d 19 a1e 19 a1f	services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Yes No No
19 a1c 19 a1d 19 a1e	services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking	No No
19 a1c 19 a1d 19 a1e 19 a1f	poes 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 have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	No No No No No
19 a1c 19 a1d 19 a1e 19 a1f	poes 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 have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	No No No No No
19 a1d 19 a1d 19 a1e 19 a1f	poes the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	No No No No No
19 a1c 19 a1d 19 a1e 19 a1f	poss the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	No No No No No No
19 a1d 19 a1d 18 a1e 19 a1f	poss the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs): Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	No No No No No No
19 a1c 19 a1d 19 a1e 19 a1f 19 a1g	pose 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 have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	No No No No No No
19 a1c 19 a1d 19 a1e 19 a1f 19 a1g 19 a1h	poes the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? MSBs	No No No No No No
19 a1c 19 a1d 19 a1e 19 a1f 19 a1g	pose 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 have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	No No No No No No

19 a1i	B	
19 411	Does the Entity have processes and procedures	
	place to identify downstream relationships with	Yes
19 b	MSBs /MVTSs/PSPs? Cross-Border Bulk Cash Delivery	
19 C	Cross-Border Bulk Cash Delivery Cross-Border Remittances	No.
19 d	Cross-Border Reminances	No
19 e	Domestic Bulk Cash Delivery	No
19 f	Hold Mail	Na
19 g	International Cash Letter	No
19 h	Low Price Securities	No
19 i	Payable Through Accounts	No
151	Payment services to non-bank emittles who may the	
	offer third party payment services to their customers	[?] No
19 1	If Y , please select all that apply below?	
19 12	Third Party Payment Service Providers	
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Pletforms	
19 i5	Other - Picase explain	
		1
		5==>
19	Private Sanking	Domestic
19 k	Remote Deposit Capture (RDC)	No
191	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 n	Trade Finance	Yes
19 o	Virtuel Assets	No
19 p	For each of the following please state whether you	
	offer the service to walk-in customers and if so, the	
	applicable level of due diligence:	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	
1 9 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	
19 p5	If you offer other services to walk-in customers	
	please provide more detail here, including	
	describing the level of due difigence.	IN/A
19 q	Other high right and at a day of the state of	
4	Other high-risk products and services identified by the Entity (please specify)	
	Citity (please specify)	Auga
		N/A
20	Confirm that all responses provided in the above Section	
		Yes
20 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
		N/A
		· · · · · ·
1	If appropriate, provide any additional information/context	
11	If appropriate, provide any additional information/context to the answers in this section.	
:1	to the answers in this section.	N/A
:1	to the answers in this section.	N/A
	to the answers in this section.	N/A
. AML, CT	to the answers in this section. F & SANCTIONS PROGRAMME	N/A
	To the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum	N/A
. AML, CT	T & SANCTIONS PROGRAMME Does the Entry have a programme that sets minimum AML, CTF and Sanctions standards regarding the	N/A
. AML, CT	To the answers in this section. F & SANCTIONS PROGRAMME Does the Entry have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components	
. AML, CT 2 2 a	To the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components Appointed Officer with sufficient experience/expertise	Yes
2 a 2 b	To the answers in this section. F & SANCTIONS PROGRAMME Does the Entry have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components Appointed Officer with sufficient experience/expertise Adverse Information Screening	Yes Yes
2 a 2 b 2 c	To the answers in this section. F & SANCTIONS PROGRAMME Does the Entry have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components Appointed Officer with sufficient experience/expertise Adverse Information Screening. Beneficial Ownership	Yes Yes Yes
2 a 2 b 2 c	To the answers in this section. F & SANCTIONS PROGRAMME Does the Entry have a programme that sets minimum AML, CTF and Sanctions standards regarding the folicwing components Appointed Officer with sufficient experience/expertise Adverse information Screening Beneficial Ownership Cash Reporting	Yes Yes Yes Yes
2 a 2 b 2 c 2 d 2 o	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 foliciwing components Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD	Yes Yes Yes Yes
2 a 2 b 2 c 2 d 2 c	To the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting GDD EDD	Yes Yes Yes Yes (es (es
2. AML, CT 2 2 a 2 b 2 c 2 d 2 c 2 d 2 f 2 g	To the answers in this section. F & SANCTIONS PROGRAMME Does the Entry have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting COD EDD Independent Testing	Yes Yes Yes Yes Yes Yes Yes (es (es (es
2 a 2 b 2 c 2 d 2 c 2 f 2 f 2 g 2 h	To the answers in this section. F & SANCTIONS PROGRAMME Does the Entry have a programme that sets minimum AML, CTF and Sanctions standards regarding the folicwing components Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting COD EDD Independent Testing Periodic Review	Yes
2 a 2 b 2 c 2 d 2 o 2 f 2 o 2 f	To the answers in this section. F & SANCTIONS PROGRAMME Does the Entry have a programme that sets minimum AML, CTF and Sanctions standards regarding the folicwing components Appointed Officer with sufficient experience/expertise Adverse information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes
2 a 2 b 2 c 2 c 2 c 2 c 2 c 2 c 2 c 2 c 2 c	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 folicizing components Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Yes
2 a 2 b 2 c 2 d 2 o 2 f 2 o 2 f	To the answers in this section. F & SANCTIONS PROGRAMME Does the Entry have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment	Yes

22 m		Yes
22 n	Trumming drive Experience	Yes
22 o		Yes
23	How many full time employees are in the Entity's AML,	11-100
24	CTF & Sanctions Compliance Department? Is the Entity's AML, CTF & Sanctions policy approved at	
	least annually by the Board or equivalent Senior	V
	Management Committee? If N, describe your practice in	Yes
	Question 29.	
25	Does the Board receive, assess, and challenge regular	Van
		Yes
26	programme? Does the Entity use third parties to carry out any	
10	components of its AML, CTF & Sanctions programme?	No
00.0	If Y, provide further details	
26 a	ii r, provide futitier details	
		N/A
	David Control of the	Van
27 28	Does the entity have a whistleblower policy? Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	Yes
28 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	N/A
29	If appropriate, provide any additional information/context	
	to the answers in this section.	N/A
	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report	Yes
	bribery and corruption?	
31	Does the Entity have an enterprise wide programme that	Yes
	sets minimum ABC standards?	TUS
32	Has the Entity appointed a designated officer or officers	W
	with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate	
••	levels of experience/expertise to implement the ABC	Yes
	programme?	
34	Is the Entity's ABC programme applicable to.	Third parties acting on behalf of the Entity
35 35 a	Does the Entity have a global ABC policy that Prohibits the giving and receiving of bribes? This	
25 S	includes promising, offering, giving, solicitation or	
	receiving of anything of value, directly or indirectly, if	Yes
	improperly intended to influence action or obtain an	
	advantage	
35 b	Includes enhanced requirements regarding	Yes
25.4	Interaction with public officials? Includes a prohibition against the falsification of books	
35 C	and records (this may be within the ABC policy or any	
	other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to mondor the	w.
**	effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular	Yes
	reporting on the status of the ABC programme?	
38	Has the Entity's ABC Enterprise Wide Risk Assessment	
	EWRA) been completed in the last 12 months?	Yes
20 -	If N, provide the date when the last ABC EWRA was	
38 a	If N, provide the date when the last ABC EWRA was completed.	
	Con protos.	N/A
20	Does the Entity have an ABC residual risk rating that is	
39	the net result of the controls effectiveness and the	Yes
	inherent risk assessment?	
40	Does the Entity's ABC EWRA cover the inherent risk	
	components detailed below	
40 a		Yes
40 b		
-00	industries in which the Entity does business, directly	Yes
	or through intermedianes	
40 c	Transactions products or services, including those	Van
		1100
40 a 40 b	components detailed below Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes

40 d		
	Corruption risks associated with gifts and hospitality hiring/internships, charitable donations and political contributions	Yes
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	Yes
42 e	Third parties to which specific compliance activities	168
	subject to ABC risk have been outsourced	Yes
42 f	Non-employed workers as appropriate	
	(contractors/consultants)	Yes
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	n Yes
44 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
	and the brancines man dus applies to.	N/A
		N/A
- 0		
45	If appropriate, provide any additional information/context	
	to the answers in this section.	
		N/A
		1
5. AML	CTF & SANCTIONS POLICIES & PROCEDURES	
45	Has the Entity documented policies and procedures	
	consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent.	
	delegat mad as a air.	
	detect and report	L.
46 a	Money laundening	Yes
46 b	Money laundering Terrorist financing	Yes Yes
46 b 45 c	Money laundering Terrorist financing Sanctions violations	Yes Yes
46 b	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least	Yes Yes
46 b 45 c 47	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually?	Yes Yes
46 b 45 c	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its pokcies and	Yes Yes
46 b 46 c 47 48	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against	Yes Yes
46 b 46 c 47 48 a	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against U.S. Standards	Yes Yes
46 b 45 c 47 48 48 a 48 a1	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against U.S. Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes Yes Yes Yes
46 b 46 c 47 48 48 a 48 a1 48 b	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against U.S. Standards If Y, does the Entity retain a record of the results? EU Standards	Yes Yes Yes Yes Yes Yes Yes Yes
46 b 45 c 47 48 48 a 48 a 48 b 48 b	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes Yes Yes Yes
46 b 45 c 47 48 48 a 48 a 48 a 48 b 48 b 49	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Oces the Entity have policies and procedures that:	Yes Yes Yes Yes Yes Yes Yes Yes
46 b 45 c 47 48 48 a 48 a 48 b 48 b	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Oces the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and	Yes Yes Yes Yes Yes Yes Yes Yes Yes
46 b 45 c 47 48 48 a 48 a 48 b 48 b 49 a	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes Yes Yes Yes Yes Yes Yes Yes
46 b 45 c 47 48 48 a 48 a 48 a 48 b 48 b 49	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Oces the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictious named accounts Prohibit the opening and keeping of accounts for	Yes
46 b 45 c 47 48 48 a 48 a1 48 b 48 b1 49 a 49 a	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Oces the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes Yes Yes Yes Yes Yes Yes Yes Yes
46 b 45 c 47 48 48 a 48 a 48 b 48 b 49 a	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Coes the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide	Yes
46 b 45 c 47 48 48 a 48 a 48 a 1 48 b 48 b 49 d 49 c	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
46 b 45 c 47 48 48 a 48 a 48 a 48 b 48 b 49 d 49 c 49 d	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts refationships with shell banks	Yes
46 b 45 c 47 48 48 a 48 a 48 a 1 48 b 48 b 49 d 49 c	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Oces the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictious named accounts. Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides	Yes Yes
46 b 48 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d 49 e	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Coes the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictious named accounts Prohibit the opening and keeping of accounts for unicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unicensed banks Prohibit decounts relationships with shell banks Prohibit dealing with another entity that provides services to shell banks	Yes
46 b 45 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d 49 f	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and factious named accounts Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities	Yes Yes
46 b 48 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d 49 e	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Oces the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictious named accounts. Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit design and keeping of accounts for Section 311 designated entities	Yes Yes
46 b 45 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d 49 f	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Prohibit the opening and keeping of anonymous and fictious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with other entities that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for early of unlicensed/unregulated remittance agents.	Yes
46 b 45 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d 49 f	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for Section unlicensed/unregulated remittance agents, exchanges houses, case de camblo, bureaux de	Yes Yes
46 b 45 c 47 48 a 48 a 48 a 48 b 48 b 49 b 49 c 49 c 49 d 49 e 49 f 49 g	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for section 311 designated entities Prohibit opening and keeping of accounts for any of unficensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
46 b 45 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d 49 f	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Oces the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unficensed/unregulated remittence agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Assess the risks of relationships with domestic and	Yes
46 b 45 c 47 48 a 48 a 48 a 48 b 48 b 49 b 49 c 49 c 49 d 49 e 49 f 49 g	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Oces the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unficensed/unregulated remittence agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Assess the risks of relationships with domestic and	Yes

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

59 a	last 12 months?	Yes
39 H	If N, provide the date when the last Sanctions EWR was completed.	N/A
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	res
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/contex to the answers in this section.	N/A
	, CDD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	
64	CDD must be completed, e.g. at the time of onboarding or within 30 days?	res
04	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g 64 h	Source of funds	Yes
65	Source of wealth	Yes
65 a	Are each of the following identified Ultimate beneficial ownership	
55 a1	Are ultimate beneficial owners venfied?	Yes
55 b	Authorised signatories (where applicable)	Yes
55 c	Key controllers	Yes Yes
i5 d	Other relevant parties	Yes
56	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	Other (Specify the percentage)
37 	Does the due diligence process result in customers receiving a risk classification?	Yes
7 a	If Y, what factors/cnteria are used to determine the customer's risk classification? Select all that apply:	
7 a1	Product Usage	Yes
7 a2	Geography	Yes
7 a3	Business Type/Industry	Yes
7 a4	Legal Entity type	Yes
7 a5 7 a6	Adverse Information	Yes
7 40	Other (specify)	Politically esposed person, holder of other political or public offices; In case of Corporates, we verify compan business nature, shareholding structure.
5	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes
8 a	ff Y, is this at	
3 a1 3 a2		Yes
a3	T	Yes
a4	Other	Yes
a4a	If yes, please specify "Other"	Yes
		n any situation where enhanced due digence measures need to be applied to non-individuals.
	Does the Entity have a risk based approach to screening	res
		es
a	If Y, is this at	es
a a1 a2	If Y, is this at	es

9 a3	Trigger event	Yes
70	Trigget brett	
	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?	
	If Y, Is this at:	
71 a 71 a1		Yes
71 a2		Yes
71 a3	Trigger event	Yes
72	has as in the worked upod by the Entity to screen PEPs?	Combination of automated and manual
		Combination of automated and mandal
73	Does the Entity have policies, procedures and processes	
	to review and escalate potential matches from screening	
		Yes
	they are PEPs, or controlled by PEPs?	
74	is KYC renewed at defined frequencies based on risk	Yes
	rating (Penadic Reviews)?	
74 a	if yes, select all that apply	Yes
74 a1 74 a2	Less than one year 1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 84	5 years or more	No
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
		15114
		N/A
75	Does the Entity maintain and report metrics on current	
	and past periodic or trigger event due ditigence reviews?	Yes
76	From the list below, which categories of customers or	
	industries are subject to EDD and/or are restricted, or	
	prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Prohibited
76 b	Respondent Banks	Do not have this category of customer or industry
76 b1	If EDD or restricted, does the EDD assessment	l
	contain the elements as set out in the Wolfsberg	No
	Correspondent Banking Principles 2022? Embassies/Consulates	Atways subject to EDD
76 c		
76 4		EDD on risk-based approach
76 d	Extractive industries	EDD on risk-based approach Always subject to EDD
76 e	Extractive industries Gambling customers	Always subject to ECD FDD on risk-based approach
76 e 76 f	Extractive industries Gambling customers General Trading Companies	Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry
76 e 76 f 76 g	Extractive industries Gambling customers	Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry Always subject to EDD
76 e 76 f	Extractive industries Gambling customers General Trading Companies Manjuana-related Entities MSB/MVTS customers Non-account customers	Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry Always subject to EDD Do not have this category of customer or industry
76 e 76 f 76 g 76 h 76 i 76 j	Extractive industries Gambling customers General Trading Companies Manjuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations	Always subject to EDD EDD on risk-based approach 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 e 76 f 76 g 76 h 76 i 76 j 76 k	Extractive industries Gambling customers General Trading Companies Manjuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers	Always subject to EDD EDD on risk-based approach 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 EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l	Extractive industries Gambling customers General Trading Companies Manjuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power	Always subject to EDD EDD on risk-based approach 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 EDD on risk-based approach Do not have this category of customer or industry
76 e 76 f 76 g 76 h 76 i 76 i 76 k 76 l 76 m	Extractive industries Gambling customers General Trading Companies Manjuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers	Always subject to EDD EDD on risk-based approach 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 EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 i 76 k 76 l 76 m 76 n	Extractive industries Gambling customers General Trading Companies Manjuana-related Entities MSB/MVTS customers Non-account customers Non-account customers Non-resident customers Nuclear power Payment Service Providers PEPs	Always subject to EDD EDD on risk-based approach 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 EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Always subject to EDD Always subject to EDD Always subject to EDD
76 e 76 f 76 g 76 h 76 l 76 k 76 l 76 k 76 l 76 m 76 n	Extractive industries Gambling customers General Trading Companies Manjuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates	Always subject to EDD EDD on risk-based approach 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 EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Always subject to EDD Always subject to EDD Always subject to EDD
76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p	Extractive industries Gambling customers General Trading Companies Manjuana-related Entities MSB/MVTS customers Non-account customers Non-account customers Non-resident customers Nuclear power Payment Service Providers PEPs	Always subject to EDD EDD on risk-based approach 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 EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Always subject to EDD
76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 i 76 n 76 n 76 o 76 p 76 q	Extractive industries Gambling customers General Trading Companies Manjuana-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	Always subject to EDD EDD on risk-based approach 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 EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Always subject to EDD Do not have this category of customer or industry
76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p	Extractive industries Gambling customers General Trading Companies Manjuana-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	Always subject to EDD EDD on risk-based approach 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 EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach 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 Always subject to EDD Co not have this category of customer or industry Always subject to EDD
76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 n 76 n 76 n 76 p 76 p 76 q	Extractive industries Gambling customers General Trading Companies Manjuana-related Entities MSB/MVTS 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	Always subject to EDD EDD on risk-based approach 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 EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach 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 Always subject to EDD Always subject to EDD Always subject to EDD Do not have this category of customer or industry Always subject to EDD Prohibited
76 e 76 f 76 g 76 h 76 l 76 k 76 l 76 l 76 m 76 n 76 n 76 n 76 c 76 p 76 r 76 s 76 t 76 t	Extractive industries Gambling customers General Trading Companies Manjuana-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 Travel and Tour Companies	Always subject to EDD EDD on risk-based approach 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 EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Always subject to EDD Do not have this category of customer or industry Always subject to EDD Prohibited EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 i 76 n 76 n 76 n 76 n 76 c	Extractive industries Gambling customers General Trading Companies Manjuana-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 Preclous metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities	Always subject to EDD EDD on risk-based approach 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 EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Always subject to EDD Always subject to EDD Always subject to EDD Do not have this category of customer or industry EDD on risk-based approach Always subject to EDD Do not have this category of customer or industry Always subject to EDD Prohibited EDD on risk-based approach Prohibited
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76 e 76 f 76 g 76 l 76 l 76 l 76 l 76 l 76 n 76 n 76 n 76 n 76 c 76 p 76 c 76 p 76 c	Extractive industries Gambling customers General Trading Companies Manjuana-related Entities MSB/MVTS customers Non-account customers Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Preclous metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers	Always subject to EDD EDD on risk-based approach 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 EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Always subject to EDD Always subject to EDD Always subject to EDD 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 Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Do not have this category of customer or industry
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 i 76 i 76 o 76 o 76 o 76 c	Extractive industries Gambling customers General Trading Companies Manjuana-related Entities MSB/MVTS customers Non-account customers Non-resident customers Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Preclous 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	Always subject to EDD EDD on risk-based approach 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 EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach 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 Always subject to EDD Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 i 76 i 76 o 76 o 76 o 76 c	Extractive industries Gambling customers General Trading Companies Manjuana-related Entities MSB/MVTS customers Non-account customers Non-resident customers Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Preclous 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	Always subject to EDD EDD on risk-based approach 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 EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Always subject to EDD Always subject to EDD Always subject to EDD 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 Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Do not have this category of customer or industry
76 e 76 f 76 g 78 h 76 i 76 i 76 i 76 i 76 n 76 n 76 n 76 c	Extractive industries Gambling customers General Trading Companies Manjuana-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 Travet and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Always subject to EDD EDD on risk-based approach 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 EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Always subject to EDD Always subject to EDD Always subject to EDD 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 Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Do not have this category of customer or industry
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 i 76 i 76 o 76 o 76 o 76 c	Extractive industries Gambling customers General Trading Companies Manjuana-related Entities MSB/MVTS customers Non-account customers Non-resident customers Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Preclous 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	Always subject to EDD 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 EDD on nisk-based approach Do not have this category of customer or industry EDD on nisk-based approach Always subject to EDD Prohibited EDD on risk-based approach EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Do not have this category of customer or industry N/A
76 e 76 f 76 g 78 h 76 i 76 i 76 i 76 i 76 n 76 n 76 n 76 c	Extractive industries Gambling customers General Trading Companies Manjuana-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 Travet and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Always subject to EDD EDD on risk-based approach 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 EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach 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 Always subject to EDD Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Do not have this category of customer or industry N/A All the categories of customers or industries as restricted are subject to condicional acceptance performed by
76 e 76 f 76 g 78 h 76 i 76 i 76 i 76 i 76 n 76 n 76 n 76 c	Extractive industries Gambling customers General Trading Companies Manjuana-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 Travet and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Always subject to EDD 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 EDD on nisk-based approach Do not have this category of customer or industry EDD on nisk-based approach Always subject to EDD Prohibited EDD on risk-based approach EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Do not have this category of customer or industry N/A
76 e 76 f 76 g 78 h 76 i 76 i 76 i 76 i 76 n 76 n 76 n 76 c	Extractive industries Gambling customers General Trading Companies Manjuana-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 Travet and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Always subject to EDD 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 Do not have this category of customer or industry EDD on nisk-based approach Do not have this category of customer or industry EDD on nisk-based approach 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 Always subject to EDD Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Do not have this category of customer or industry N/A All the categories of customers or industries as restricted are subject to condicional acceptance performed by compliance department

78 a	If Y indicate who provides the approval:	
79	Does the Entity have specific procedures for onboarding	Both
	entities that handle client money such as lawyers.	
	accountants, consultants, real estate agents?	Yes
	accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or quality	V
	review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section	on
	are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
		· I
82	If consequents armids and different sections	
	If appropriate, provide any additional information/contex to the answers in this section.	it i
	to the allswers in this section.	
8. MONI	TORING & REPORTING	
83	Does the Entity have not have	
	Does the Entity have risk based policies, procedures ar	d
	monitoring processes for the identification and reporting	Yes
84	of suspicious activity?	
04	What is the method used by the Entity to monitor	Automated
84 a	transactions for suspicious activities?	
04 4	If manual or combination selected, specify what type	
	of transactions are monitored manually	
84 b	If automated or combination selected, are internal	
	system or vendor-sourced tools used?	Vendor-sourced tools
84 b1	If "Vendor-sourced tool" or 'Both' selected, what is	
	the name of the vendor/tool?	
	THE THE TOTAL POLICE IT	DCS AMI. The yearder in Chatter Courter
		DCS_AML. The vendor is Dixtior; SWIFT Transaction screening; FACTIVA (Dow Jones)
34 b2	When was the tool last updated?	1-2 years
34 b3	When was the automated Transaction Monitoring	1-2 years
	application last calibrated?	1-2 years
15	Does the Entity have regulatory requirements to report	
	suspicious transactions?	Yes
5 a	If Y, does the Entity have policies, procedures and	
	processes to comply with suspicious transaction	Va-
	reporting requirements?	Yes
6	Does the Entity have policies, procedures and processes	
	to review and escalate matters arising from the	
	monitoring of customer transactions and activity?	Yes
7		
•	Does the Entity have a data quality management programme to ensure that complete data for all	The state of the s
	programme to enade triat complete data for all	Yes
0	transactions are subject to monitoring?	Yes
8	transactions are subject to monitoring? Does the Entity have processes in place to respond to	
8	transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a	Yes
	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?	
8	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	
	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	
3	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?	Yes
	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
)	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	Yes
3	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
)	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 II 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
)	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 II 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
)	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 II 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
)	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	Yes Yes
) la	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	Yes Yes
) la	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	Yes Yes
) la	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	Yes Yes
) la	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 to the answers in this section.	Yes Yes
) la	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 to the answers in this section.	Yes Yes
) la	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 to the answers in this section.	Yes Yes

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
00 -		Yes .
93 a	TATE NECOMMICHABILITY	Yes
93 b	Lucai regulations	100
93 b1	If Y, specify the regulation	Please refer to attached appendix to this questionnaire
93 c	If N. explain	
94	border payment messages?	Yes
95	messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	NA
10. SANC	TIONS	
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?	No
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Both Automated and Manual
102 a	if 'automated' or 'both automated and manual' selected	
102 a1	Are internal system of vendor-sourced tools used?	Both
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	DCS_AML. The vendor is Dixtor : SWIFT Transaction screening;FACTIVA (Dow Jones)
102 a2	When did you last test the effectiveness of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Automated
105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions acreening?	Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes.	

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106 a	Constitution to the second	A 1'4
	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used Committee and to the serving transactional data
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
108 f	Other (specify)	Used for screening customers and beneficial owners and for filtering transactional data
		PEPs List and Adverse Midea
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entit	
	updates their active manual and/or automated screenin systems against:	9
107 a	Customer Data	
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branche	Same day to 2 business days
	subsidiaries, or representative offices located in	5,
	countries/regions against which UN, OFAC, OFSI, EU o	
	jurisdiction-based Sanctions?	
109	Confirm that all resconded provided in the standard	
	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
110	M anaronateta annulais annulai	
•••	If appropriate, provide any additional information/context to the answers in this section.	N/A
14 TOAK	RING & EDUCATION	
111	MAG & EDUCATION	
	Does the Entity provide mandatory training, which includes	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering,	
	terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations.	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to :	103
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have	res Not Applicable
112 f	Non-employed workers (contractors/consultants)	Not Applicable
113	Coes the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high	Yes
14	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
	CTF and Sanctions staff?	
14 a 15	CTF and Sanctions staff?	

15 a	If N, clarify which questions the difference/s relate to	
13 a	and the branch/es that this applies to.	
	\	
16	If appropriate, provide any additional information/context	
	to the answers in this section.	
en CUALITY	Y ASSURANCE /COMPLIANCE TESTING	
	Does the Entity have a program wide risk based Quality	
117	Assurance programme for financial crime (separate from	Vor
	the independent Audit function)?	
	the independent Augn tunicion) /	
118	Does the Entity have a program wide risk based	Yes
	Combination (Cotting bissance fashering transmission)	143
	Independent Audit function)?	
119	Confirm that all responses provided in the above Section	Yes
	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.	
	Harmonda provide any additional information learning	
120	If appropriate, provide any additional information/context	
	to the answers in this section.	
13. AUDIT		
121	In addition to inspections by the government	
121	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?	
450	How often is the Entity audited on its AML, CTF, ABC.	
122	Fraud and Sanctions programme by the following:	
-		Manada.
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Yearly
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	Yes
	procedures	V
123 b	Enterprise Wide Risk Assessment	Yes Yes
123 c		
	Governance	
123 d	KYC/CDD/EDD and underlying methodologies	Yes
	KYC/CDD/EDD and underlying methodologies Name Screening & List Management	Yes Yes
123 d	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information	Yes Yes Yes
123 d 123 e	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing	Yes Yes Yes Yes
123 d 123 e 123 f	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology	Yes Yes Yes Yes Yes Yes
123 d 123 e 123 f 123 g	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring	Yes Yes Yes Yes Yes Yes Yes Yes
123 d 123 e 123 f 123 g 123 h	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology	Yes
123 d 123 e 123 f 123 g 123 h 123 i	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring	Yes Yes Yes Yes Yes Yes Yes Yes
123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filting Technology Transaction Monitoring Transaction Monitoring Transaction Screening including for sanctions Training & Education	Yes
123 d 123 e 123 f 123 g 123 h 123 i 123 j	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions	Yes
123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filting Technology Transaction Monitoring Transaction Monitoring Transaction Screening including for sanctions Training & Education	Yes
123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filting Technology Transaction Monitoring Transaction Monitoring Transaction Screening including for sanctions Training & Education	Yes
123 d 123 e 123 f 123 g 123 h 123 i 123 i 123 i 123 j 123 k	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify)	Yes
123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit	Yes
123 d 123 e 123 f 123 g 123 h 123 i 123 i 123 i 123 j 123 k	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and	Yes
123 d 123 e 123 f 123 f 123 h 123 i 123 j 123 k 123 l	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
123 d 123 e 123 f 123 g 123 h 123 i 123 i 123 j 123 k 123 l	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all insponses provided in the above section	Yes
123 d 123 e 123 f 123 g 123 g 123 i 123 i 123 i 123 i 123 j 123 k 123 l	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
123 d 123 e 123 f 123 f 123 g 123 h 123 i 123 j 123 j 123 k 123 l	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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
123 d 123 e 123 f 123 g 123 g 123 i 123 i 123 i 123 i 123 j 123 k 123 l	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
123 d 123 e 123 f 123 g 123 g 123 i 123 i 123 i 123 i 123 j 123 k 123 l	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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
123 d 123 e 123 f 123 f 123 h 123 i 123 i 123 i 123 j 123 k 123 l	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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
123 d 123 e 123 f 123 f 123 g 123 h 123 i 123 j 123 k 123 l	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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
123 d 123 e 123 f 123 f 123 h 123 i 123 i 123 i 123 j 123 k 123 l	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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
123 d 123 e 123 f 123 f 123 g 123 h 123 i 123 j 123 k 123 l	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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
123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 j 123 k 123 l	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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
123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 j 123 k 123 l	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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
123 d 123 e 123 f 123 g 123 h 123 i 123 i 123 i 123 i 123 j 123 k 123 a 125 a	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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
123 d 123 e 123 f 123 g 123 h 123 i 123 i 123 i 123 i 123 i 123 a 125 a 126	Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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
123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 j 123 z 123 z 123 z 123 z 123 z 123 z 123 z 123 z 123 z	Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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
123 d 123 e 123 f 123 f 123 g 123 h 123 i 123 k 123 k 123 c 125 a	KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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
123 d 123 e 123 f 123 g 123 h 123 i 123 i 123 i 123 i 123 z 123 z 125 a 126	Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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

129	Does the Entity have real time monitoring to detect fraud?	Yes
130	address, GPS location, and/or device ID?	No
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	We have a whistleblowing channel where fraud complaints and other behaviours are made under the umbrella of Code of Conduct. These compaints are channelled to Whistleblowing Committee made up of Compliance. Legal, Human Resources and Audit Apart from whistleblowing, internal audit also monitor fraud on a daily basis.
132	If appropriate, provide any additional information/context to the answers in this section.	

Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)
Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering,
Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)

Banco de Fomento Angola, S.A. (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime 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 combal financial crime in order to protect its reputation and to meet its legal and regulatory obligations

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

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

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

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

Liana Marques da Santos (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 am authorised to execute this declaration on behalf of the Financial Institution

(Signature & Date) 76/04/2088

S. 445 (Signatura & Date) 11/04/2025

Appendix

the Wolfsberg Group Questionnaire

7. KYC, C	DD and EDD	
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	In compliance with Angolan legislation, we identify all Ultimate Beneficial Owners (UBOs), regardless of their ownership percentage.
	nt Transparency	
93 b	Local Regulations	Yes
93 b1	If yes, specify the regulation	Law No. 11/2024, of July 4 th , is an Angolan law that aims to amend the existing legislation on the prevention and combating of money laundering, terrorist financing, and the proliferation of weapons. More specifically, the law amends Law No. 5/20, of January 27th, which had already established the legal framework on these matters. Law No. 5/20 of January 27 is the Law on the prevention and combating of money laundering, terrorist financing, and the proliferation of weapons of mass destruction in Angola. This law establishes preventive and repressive measures to combat these crimes. Presidential Decree No. 73/2023, published in Angola, approves the national strategy and general guidelines of the plan for the prevention and combat of money laundering, terrorist financing, and the proliferation of weapons of mass destruction. This decree aims to strengthen the financial system, protect internal security, and promote sustainable economic development, being a priority of the Angolan government. Law No. 9/2024 in Angola establishes the framework for the prevention and combat of terrorism financing, aiming to align the national legal system with international standards and ensure its effectiveness. The law amends and adjusts the previous legal

framework, Law No. 19/17 of
August 25, concerning the
prevention and combat of
terrorism, terrorism financing, and
related crimes.
Notice No. 2/24 of 22 March 2024
establishes the rules and
procedures for preventing and
combating money laundering,
terrorist financing and proliferation
of weapons of mass destruction.