the Wolfsberg Group

Financial Institution Name: Location (Country) :

Commercial Bank ProCredit Bank JSC Republic of Moldova

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

No #) is materially different than its Entity Head Office, a separate questionn Question	Answer
		Answer
1. ENIIIY	& OWNERSHIP	
1	Full Legal Name	
		Communical Death Death Death ICC
		Commercial Bank ProCredit Bank JSC
2	Append a list of foreign branches which are covered by	
2	this questionnaire	
	tilis questionnaire	https://www.procreditbank.md/en/filial
		This is a second and the second and
3	Full Legal (Registered) Address	
	3. (3,	
		65, Stefan cel Mare si Sfant Ave., office 901, MD 2001, Chisinau
4	Full Primary Business Address (if different from above)	
		n/a
_	5 . (5)	
5	Date of Entity incorporation/establishment	
		25 0 + 07
		25-Oct-07
6	Select type of ownership and append an ownership chart	
-	if available	
6.0		No
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	
6 b	Member Owned/Mutual	No
6 C	Government or State Owned by 25% or more	No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate	165
oui	beneficial owners with a holding of 10% or more	
	beneficial owners with a florating of 1070 of filore	ProCredit Holding AG & Co. KGaA 100%, Frankfurt am Main, Germany, a publicly traded company at
		Frankfurt Stock Exchange (ISIN: DE0006223407)
7	% of the Entity's total shares composed of bearer shares	
		None
8	Does the Entity, or any of its branches, operate under an	No
	Offshore Banking License (OBL)?	
8 a	If Y, provide the name of the relevant branch/es	
	which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide	
3	services only through online channels?	no
10	Name of primary financial regulator/supervisory authority	
10	Iname of primary financial regulator/supervisory authority	
		National Bank of Moldova
		http://bnm.md/en/
11	Provide Legal Entity Identifier (LEI) if available	
	· ·	
		529900UUEJRTK2FUKK65
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	D. O. F. H. H. F A O. A. O KO. A
		ProCredit Holding AG & Co. KGaA
12	Juriodiation of liganoing outbacks and appulates of	
13	Jurisdiction of licensing authority and regulator of	
	ultimate parent	Germany, Federal financial Supervisory Authority
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b	Private Banking	No
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	No No
14 e	Financial Markets Trading	No No
	Securities Services/Custody	
14 g		No No
14 h	Broker/Dealer Multileteral Development Bank	No No
14 i	Multilateral Development Bank	No .
14 j	Wealth Management	No
14 k	Other (please explain)	
	I and the second	

15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	No
15 a	If Y, provide the top five countries where the non- resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	51-200
16 b		Between \$100 and \$500 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	

19	CTS & SERVICES Does the Entity offer the following products and services:	
	, 51	
19 a 19 a1	Correspondent Banking	No
19 a1 19 a1a	If Y Does the Entity offer Correspondent Banking	
19 414	services to domestic banks?	
19 a1b	Does the Entity allow domestic bank clients to	
	provide downstream relationships?	
19 a1c	Does the Entity have processes and procedures	
	in place to identify downstream relationships	
19 a1d	with domestic banks? Does the Entity offer Correspondent Banking	
19 a i u	services to foreign banks?	
19 a1e	Does the Entity allow downstream relationships	
	with foreign banks?	
19 a1f	Does the Entity have processes and procedures	
	in place to identify downstream relationships with foreign banks?	
19 a1g	Does the Entity offer Correspondent Banking	
	services to regulated Money Services	
	Businesses (MSBs)/Money Value Transfer	
19 a1h	Does the Entity allow downstream relationships	
	with MSBs, MVTSs, or Payment Service	
	Provider (PSPs)?	
19 a1h1	MSBs MV/TS-	
19 a1h2	MVTSs	
19 a1h3	PSPs Does the Entity have processes and procedures	
19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships	
	with MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No
19 f	International Cash Letter	No
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then	
	offer third party payment services to their	No
	customers?	
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
19 р	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		No
19 p1a	If yes, state the applicable level of due diliger	
19 p2		No
19 p2a	If yes, state the applicable level of due diliger	
19 p3		No non
19 p3a	If yes, state the applicable level of due diliger	No
19 p4 19 p4a	Sale of Monetary Instruments If yes, state the applicable level of due diliger	
19 p4a 19 p5	If you offer other services to walk-in customers	
19 90	please provide more detail here, including describing the level of due diligence.	n/a
19 q	Other high-risk products and services identified by the Entity (please specify)	n/a
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	

3. AMI.	CTF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum	
	AML, CTF and Sanctions standards regarding the	
	following components:	
22 a	Appointed Officer with sufficient	Yes
22 b	Adverse Information Screening	Yes
22 c	Beneficial Ownership	Yes
22 d	Cash Reporting	Yes
22 e	CDD	Yes
22 f	EDD	Yes
22 g	Independent Testing	Yes
22 h	Periodic Review	Yes
22 i	Policies and Procedures	Yes
22 i	PEP Screening	Yes
22 k	Risk Assessment	Yes
22 I	Sanctions	Yes
22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML,	
	CTF & Sanctions Compliance Department?	1-10
24	Is the Entity's AML, CTF & Sanctions policy approved at	
	least annually by the Board or equivalent Senior	Was .
	Management Committee? If N, describe your practice in	Yes
	Question 29.	
25	Does the Board receive, assess, and challenge regular	
	reporting on the status of the AML, CTF, & Sanctions	Yes
	programme?	
26	Does the Entity use third parties to carry out any	
	components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	
20 0	ii 1, provide futilier details	
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	
28 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context	
	to the answers in this section.	
	to the answers in this section.	

4 ANTIB	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
50	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	
31	sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers	
32	with sufficient experience/expertise responsible for	Yes
	coordinating the ABC programme?	
33	Does the Entity have adequate staff with appropriate	
33	levels of experience/expertise to implement the ABC	Yes
	programme?	
34	Is the Entity's ABC programme applicable to:	Not Applicable
35	Does the Entity have a global ABC policy that:	TWO Applicable
35 a	Prohibits the giving and receiving of bribes? This	
33 a	includes promising, offering, giving, solicitation or	
	receiving of anything of value, directly or indirectly,	Yes
	if improperly intended to influence action or obtain	
	an advantage	
35 b	Includes enhanced requirements regarding	
33 B	interaction with public officials?	Yes
35 c	Includes a prohibition against the falsification of	
30 0	books and records (this may be within the ABC	
	policy or any other policy applicable to the Legal	Yes
	Entity)?	
	**	
36	Does the Entity have controls in place to monitor the	Yes
	effectiveness of their ABC programme?	100
37	Does the Board receive, assess, and challenge regular	V
	reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment	
	(EWRA) been completed in the last 12 months?	Yes
	(=,	
20 -	If N are side the date when the last ADC EWIDA was	
38 a	If N, provide the date when the last ABC EWRA was completed.	
	completed.	
39	Does the Entity have an ABC residual risk rating that is	
00	the net result of the controls effectiveness and the	Yes
	inherent risk assessment?	
40	Does the Entity's ABC EWRA cover the inherent risk	
40	components detailed below:	
40 a	Potential liability created by intermediaries and other	
	third-party providers as appropriate	Yes
40 b	Corruption risks associated with the countries and	
	industries in which the Entity does business, directly	Yes
	or through intermediaries	
40 c	Transactions, products or services, including those	
	that involve state-owned or state-controlled entities	Yes
	or public officials	
40 d	Corruption risks associated with gifts and hospitality.	
	hiring/internships, charitable donations and political	Yes
	contributions	
40 e	Changes in business activities that may materially	V.
	increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other	
	independent third party cover ABC Policies and	Yes
	Procedures?	
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities	
	subject to ABC risk have been outsourced	No
42 f	Non-employed workers as appropriate	V.
	(contractors/consultants)	Yes
43	Does the Entity provide ABC training that is targeted to	V
	specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section	V
	are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context	
	to the answers in this section.	42e is not applicable to the Bank, because the Bank does not have compliance activities outsourced to the third
		parties.
		l'

3. AIVIL, 1	CTF & SANCTIONS POLICIES & PROCEDURES Has the Entity documented policies and procedures	
46	consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent,	
	detect and report:	
16 a	Money laundering	Yes
16 b	Terrorist financing	Yes
+6 D 46 с	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least	
41	annually?	Yes
48	Has the Entity chosen to compare its policies and	
40	procedures against:	
48 a	U.S. Standards	No
48 a1	If Y, does the Entity retain a record of the	Not Applicable
48 b	EU Standards	No
48 b1	If Y, does the Entity retain a record of the	No
49 49	Does the Entity have policies and procedures that:	INC
49 a	Prohibit the opening and keeping of anonymous and	
45 a	fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for	
	unlicensed banks and/or NBFIs	Yes
49 с	Prohibit dealing with other entities that provide	Yes
	banking services to unlicensed banks	
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section	
	311 designated entities	Yes
49 g	Prohibit opening and keeping of accounts for any of	
•	unlicensed/unregulated remittance agents,	v
	exchanges houses, casa de cambio, bureaux de	Yes
	change or money transfer agents	
49 h	Assess the risks of relationships with domestic and	
	foreign PEPs, including their family and close	Yes
	associates	
49 i	Define the process for escalating financial crime risk	
	issues/potentially suspicious activity identified by	Yes
	employees	
49 j	Define the process, where appropriate, for	
	terminating existing customer relationships due to	Yes
	financial crime risk	
49 k	Define the process for exiting clients for financial	
	crime reasons that applies across the entity,	Yes
	including foreign branches and affiliates	
49 I	Define the process and controls to identify and	
	handle customers that were previously exited for	Yes
	financial crime reasons if they seek to re-establish a	199
	relationship	
49 m	Outline the processes regarding screening for	Yes
	sanctions, PEPs and Adverse Media/Negative News	100
49 n	Outline the processes for the maintenance of	V
	internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or	
	similar document which defines a risk boundary around	Yes
	their business?	
51	Does the Entity have record retention procedures that	Yes
	comply with applicable laws?	100
51 a	If Y, what is the retention period?	
		5 years or more
52	Confirm that all responses provided in the above Section	
3 2	are representative of all the LE's branches	Yes
52 a	If N. clarify which questions the difference/s relate to	
oz a	and the branch/es that this applies to.	
	and the branchives that this applies to.	
53	If appropriate, provide any additional information/context	
	to the answers in this section.	48a, 48b. The bank by itself does not perform gap analysis against US and EU standards, because the US and
		EU standards requirements are already included in the ProCredit Group AML/CTF policy, which is transposed
		directly in the ProCredit Bank Moldova policy. So, there is no need to perform additional gap analysis.

	B I F I I I I I I I I I I I I I I I I I		
54	Does the Entity's AML & CTF EWRA cover the inherent		
54 a	risk components detailed below: Client	Vaa	
54 b	Product	Yes Yes	
54 C	Channel	Yes	
54 d	Geography	Yes	
54 a		Yes	
55	Does the Entity's AML & CTF EWRA cover the controls		
55 a	effectiveness components detailed below: Transaction Monitoring	Yes	
55 b	Customer Due Diligence	Yes	
55 C	PEP Identification		
55 d	Transaction Screening	Yes	
		Yes	
55 e	Name Screening against Adverse Media/Negative News	Yes	
FF 4		Vee	
55 f 55 g	Training and Education Governance	Yes Yes	
55 h	Management Information	Yes	
56	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes	
56 a			
56 a	If N, provide the date when the last AML & CTF EWRA was completed.		
57	Does the Entity's Sanctions EWRA cover the inherent		
	risk components detailed below:		
57 a	Client	Yes	
57 b	Product	Yes	
57 c	Channel	Yes	
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	List Management	Yes	
58 d	Management Information	Yes	
58 e	Name Screening	Yes	
58 f	Transaction Screening	Yes	·
58 g	Training and Education	Yes	·
59	Has the Entity's Sanctions EWRA been completed in the	Yes	
	last 12 months?	100	
59 a	If N, provide the date when the last Sanctions		·
	EWRA was completed.		
60	Confirm that all responses provided in the above Section		
90	are representative of all the LE's branches	Yes	
60 a	are representative of all the LE's branches If N, clarify which questions the difference/s relate to		
ou a			
	and the branch/es that this applies to.		
61	If appropriate, provide any additional information/context		
	to the answers in this section.		

68	
CDD must be completed, e.g. at the time of onboarding or within 30 days? 64 Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: 64 C Customer identification 64 Expected activity 64 C Nature of business/employment 76 Yes 64 C Product usage 77 Yes 64 P Product usage 78 Yes 64 P Purpose and nature of relationship 78 Yes 64 P Source of funds 65 I Source of usealth 78 Yes 65 Are each of the following identified: 65 A Ultimate beneficial ownership 65 Authorised signatories (where applicable) 78 Yes 65 Authorised signatories (where applicable) 65 Key controllers 65 Authorised signatories (where applicable) 78 Yes 66 What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? 67 Does the due diligence process result in customers receiving a risk classification? 67 Uses 67 all FY, what factors/criteria are used to determine the customer's risk classification? 67 all FY, what factors/criteria are used to determine the customer's risk classification? 67 all Expected out Usage 78 Adverse Information 79 Yes 67 al Legal Entity type 79 Yes 67 al Legal Entity type 79 Yes 68 all Other (specify) 79 Per Or PEP relate turnover, High avail 68 all Onboarding 79 Yes 69 all FY, is this at: 69 all Onboarding 79 Yes 69 all FY, is this at: 69 al Once the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 70 Adverse Media/Negative News? 71 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 71 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 71 all FY, is this at: 71 all Onboarding 72 Yes 73 Does the Entity ha	
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 d Ownership structure Yes 64 d Ownership structure Yes 64 d Ownership structure Yes 64 d Product usage Yes 64 f Purpose and nature of relationship Yes 64 f Purpose and nature of relationship Yes 65 d Source of tunds Yes 65 Are each of the following identified: 65 Are outlimate beneficial owners verified? Yes 65 Authorised signatories (where applicable) Yes 65 Key controllers 66 Key controllers 67 Ober relevant parties 68 What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? 67 Does the due diligence process result in customers receiving a risk classification? Select all that apply: 67 a If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: 67 a1 Product Usage Yes 67 a2 Geography Yes 67 a3 Business Type/Industry Yes 67 a4 Legal Entity type Yes 67 a4 Legal Entity type Yes 67 a5 Adverse Information Yes 68 a If Y, is this at: 68 a1 Onboarding Yes 68 a2 KYC renewal 68 a3 Trigger event Yes 68 a4 Other 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 71 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 71 Chocarding Yes 72 What is the method used by the Entity to screen for Adverse Media/Negative News? 71 Chocarding Yes 73 Trigger event Yes 74 What is the method used by the Entity to screen PEPs? 74 What is the method used by the Entity to screen PEPs? 75 Combination of aut 76 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 75 Unbastien on Controlled by PEPs? 76 What is the method used by the Entity to screen PEPs? 77 La If Y, is this at: 78 C	
64 b Expected activity Ves 64 c Nature of business/employment Yes 64 d Ownership structure Yes 64 d Ownership structure Yes 64 d Product usage Yes 64 f Purpose and nature of relationship Yes 65 d Source of funds Yes 65 Are each of the following identified: 65 a Ultimate beneficial ownership Yes 65 a Are each of the following identified: 65 a Ultimate beneficial ownership Yes 65 ta Are ultimate beneficial ownership Yes 65 ta Authorised signatories (where applicable) Yes 65 ta Authorised signatories (where applicable) Yes 65 ta Cycontrollers Yes 65 d Other relevant parties Yes 66 What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? 67 Does the due diligence process result in customers receiving a risk classification? 67 a If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: 67 a1 Product Usage Yes 67 a2 Geography Yes 67 a3 Business Type/Industry Yes 67 a3 Business Type/Industry Yes 67 a4 Legal Entity type Yes 67 a5 Adverse Information Yes 67 a6 Other (specify) 68 a If Y, is this at: 68 a1 Onboarding Yes 68 a1 If Y, is this at: 68 a1 Onboarding Yes 68 a2 KYC renewal Yes 68 a3 Trigger event Yes 69 a If Y, is this at: 69 a1 Onboarding Yes 69 a If Y, is this at: 69 a1 Onboarding Yes 69 a If Y, is this at: 69 a1 Onboarding Yes 69 a If Y, is this at: 69 a1 Onboarding Yes 69 a If Y, is this at: 69 a1 Onboarding Yes 69 a2 KYC renewal Yes 69 a3 Trigger event 70 What is the method used by the Entity to screen for Adverse Media/Negative News? 71 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 71 a If Y, is this at: 71 a1 Onboarding Yes 72 What is the method used by the Entity to screen PEPs? 73 What is the method used by the Entity to screen PEPs? 74 What is the method used by the Entity to screen P	
64 b Expected activity Yes 64 c Nature of business/employment Yes 64 d Ownership structure Yes 64 e Product usage Yes 64 f Product usage Yes 64 f Product usage Yes 64 g Source of funds Yes 65 A Ge acah of the following identified: 65 a Ultimate beneficial ownership 65 a Are each of the following identified: 65 a Ultimate beneficial ownership 65 a Are acah of the following identified: 65 a Ultimate beneficial ownership 65 b Authorised signatories (where applicable) Yes 65 c Key controllers Yes 65 d Other relevant parties 66 What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? 67 Does the due diligence process result in customers 68 receiving a risk classification? 68 If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: 67 a1 Product Usage 67 a2 Geography 67 a3 Business Type/Industry 67 a3 Business Type/Industry 67 a4 Legal Entity type 67 a5 Adverse Information 68 For high risk non-individual customers, is a site visit a part of your KYC process? 68 a1 Onboarding 68 For high risk non-individual customers, is a site visit a part of your KYC process? 68 a2 KYC renewal 68 a3 Trigger event 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 69 a If Y, is this at: 69 a1 Onboarding 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 71 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 72 What is the method used by the Entity to screen for Adverse Media/Negative News? 73 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 74 Under the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 75 What is the method used by the Entity to screen PEPs? 76 What is the method used by the Entity to screen PEPs? 7	
64 d	
64 d Ownership structure Yes 64 e Product usage Yes 64 f Purpose and nature of relationship Yes 64 f Purpose and nature of relationship 64 g Source of funds 65 h Source of wealth Yes 65 a Are each of the following identified: 65 a Ultimate beneficial ownership 65 a Are each of the following identified: 65 a Ultimate beneficial ownership 65 a Are each of the following identified: 65 a Are each of the following identified: 65 a What is the Entity's minimum (lowest) where applicable) 65 a Combination of the service of the servic	
64 e Product usage 64 f Purpose and nature of relationship 64 g Source of funds 65 and Source of wealth 65 and Purpose and nature of relationship 65 and Purpose and nature of relationship 65 and Purpose and nature of relationship 65 and Purpose of funds 65 and Ultimate beneficial ownership 65 and Ultimate beneficial owners verified? 65 and Are utilimate beneficial owners verified? 65 and Are utilimate beneficial owners verified? 65 and Are utilimate beneficial owners verified? 65 and Other relevant parties 66 Matis the Entity's minimum (lowest) threshold applied to beneficial ownership identification? 67 Does the due diligence process result in customers receiving a risk classification? 67 If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: 67 and If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: 67 and Geography 67 and Geography 78 Product Usage 67 and Business Type/Industry 78 Product Usage 67 and Legal Entity type 79 Yes 67 and Adverse Information 70 Other (specify) 70 PEP or PEP relate turnover, High avail 71 Onboarding 79 Per or PEP relate turnover, High avail 71 Onboarding 79 Per or PEP relate furnover, High avail 70 What is the method used by the Entity to screening customers for Adverse Media/Negative News? 70 What is the method used by the Entity to screen for Adverse Media/Negative News? 71 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 71 and If Y, is this at: 71 and FY,	
64 f Purpose and nature of relationship Yes 64 g Source of funds 65 h Source of wealth 65 a Are each of the following identified: 65 a Ultimate beneficial ownership 65 at Jultimate beneficial owners verified? 65 at Jultimate beneficial owners verified? 65 b Authorised signatories (where applicable) 65 c Key controllers 65 d Other relevant parties 66 d What is the Entity's minimum (lowest) threshold applied 66 What is the Entity's minimum (lowest) threshold applied 67 boses the due diligence process result in customers 67 receiving a risk classification? 67 leves the due diligence process result in customers 67 receiving a risk classification? 68 leves the due diligence process result in due to the entity of the customer's risk classification? Select all that apply: 68 leves the due to the entity of the customer's risk classification? Select all that apply: 68 leves the due to the entity of the customer's risk classification? 69 Cate of the customer's risk classification? 60 Cate of the customer's risk classification? 60 Cate of the customer's risk classification? 61 Product Usage 62 Adverse information 63 Adverse information 64 Adverse information 65 Adverse information 66 Adverse information 67 Adverse information 68 Adverse information 69 Cate of the customer's risk classification? 69 Adverse Media/Negative News? 69 Adverse Media/Negative News? 69 Adverse Media/Negative News? 70 What is the method used by the Entity to screen for Adverse Media/Negative News? 71 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 71 All Onboarding 72 What is the method used by the Entity to screen PEPs? 73 What is the method used by the Entity to screen PEPs? 74 What is the method used by the Entity to screen PEPs? 75 What is the method used by the Entity to screen PEPs? 76 Combination of automatic purposes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or c	
Source of funds	
65 Are each of the following identified: 65 a Ultimate beneficial ownership Yes 65 at I Are ultimate beneficial owners verified? Yes 65 at Are very controllers Yes 65 b Authorised signatories (where applicable) Yes 65 c Key controllers Yes 65 d Other relevant parties Yes 66 What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? 67 Does the due diligence process result in customers receiving a risk classification? Ones the due diligence process result in customers receiving a risk classification? Select all that apply: 67 at If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: 67 at Product Usage 67 a2 Geography Yes 67 a3 Business Type/Industry Yes 67 a3 Business Type/Industry Yes 67 a4 Legal Entity type 77 a5 Adverse Information Yes 67 a6 Other (specify) 68 a If Y, is this at: 68 For high risk non-individual customers, is a site visit a part of your KYC process? 68 at If Onboarding Yes 68 a2 KYC renewal 68 a3 Trigger event 68 a4 Other 68 a4 Other 68 a4 Other 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 70 What is the method used by the Entity to screen for Adverse Media/Negative News? 71 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 71 at If Y, is this at: 71 at Onboarding Yes 71 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 72 What is the method used by the Entity to screen PEPs? 73 Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
65 a Ultimate beneficial ownership Yes 65 at Are each of the following identified: 65 at Are ultimate beneficial owners verified? 65 b Authorised signatories (where applicable) 65 c Key controllers 65 c Key controllers 66 What is the Entity minimum (lowest) threshold applied to beneficial ownership identification? 67 Does the due diligence process result in customers receiving a risk classification? 67 at If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: 67 at Product Usage Yes 67 a2 Geography 67 a3 Business Type/Industry 67 a4 Legal Entity type 67 a5 Adverse Information 67 a6 Other (specify) 68 a If Y, is this at: 68 a1 Onboarding 68 a2 KYC renewal 68 a3 Trigger event 68 a4 Other 68 a4 Other 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 70 What is the method used by the Entity to screen for Adverse Media/Negative News? 71 a If Y, is this at: 71 at Onboarding 74 yes 75 and Ty, is this at: 76 a If Y, is this at: 77 a If Y, is this at: 78 a If Y, is this at: 79 a If Y, is this at: 70 What is the method used by the Entity to screen for Adverse Media/Negative News? 71 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 71 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 72 What is the method used by the Entity to screen PEPs? 73 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 74 What is the method used by the Entity to screen PEPs? 75 Combination of autority and controlled by PEPs? 76 What is the method used by the Entity to screen PEPs? 77 Does the Entity have a price determine whether they are PEPs, or controlled by PEPs?	
State	
Are ultimate beneficial owners verified? Yes	
65 b Authorised signatories (where applicable) Yes 65 c Key controllers Yes 66 d Other relevant parties 66 d What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? 67 Does the due diligence process result in customers receiving a risk classification? 67 a If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: 67 a1 Product Usage Yes 67 a2 Geography 67 a3 Business Type/Industry Yes 67 a4 Legal Entity type Yes 67 a5 Adverse Information 67 a6 Other (specify) 68 a1 Cother (specify) 79 PEP or PEP relate turnover, High avai 68 For high risk non-individual customers, is a site visit a part of your KYC process? 68 a If Y, is this at: 68 a1 Onboarding Yes 68 a2 KYC renewal 68 a3 Trigger event 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 69 a If Y, is this at: 69 a1 Onboarding Yes 69 a2 KYC renewal 70 What is the method used by the Entity to screen for Adverse Media/Negative News? 71 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 71 a If Y, is this at: 71 a1 Onboarding Yes 71 a2 KYC renewal 72 What is the method used by the Entity to screen FePs? 73 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 71 a If Y, is this at: 71 a1 Onboarding Yes 72 What is the method used by the Entity to screen PEPs? 73 Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 74 Is KYC renewal teefined frequencies based on risk 75 Ves	
65 d Other relevant parties 66 What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? 67 Does the due diligence process result in customers receiving a risk classification? process result in customers receiving a risk classification? Select all that apply: 67 a1 If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: 67 a1 Product Usage 67 a2 Geography 7 yes 67 a3 Business Type/Industry 7 yes 67 a4 Legal Entity type 7 yes 67 a5 Adverse Information 7 yes 67 a6 Other (specify) 68 por high risk non-individual customers, is a site visit a part of your KYC process? 68 a1 if Y, is this at: 68 a1 Onboarding 68 a2 KYC renewal 7 yes 68 a3 Trigger event 68 a4 Other 68 a4 Other 68 a4 Other 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 69 a1 if Y, is this at: 69 a1 Onboarding 69 a2 KYC renewal 7 yes 7 yes 7 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 7 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 7 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 7 What is the method used by the Entity to screen PEPs? 7 What is the method used by the Entity to screen PEPs? 7 What is the method used by the Entity to screen PEPs? 7 Combination of aut 7 Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 7 In a KYC renewal of Serversion and connected parties to determine whether they are PEPs, or controlled by PEPs? 7 In a KYC renewal of Serversion and connected parties to determine whether they are PEPs, or controlled by PEPs?	
What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	
to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Tall Product Usage Tall Produ	
to beneficial ownership loentification? To boes the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: To all Product Usage Yes Ta 2 Geography Yes Ta 3 Business Type/Industry Yes Ta 3 Business Type/Industry Yes Ta 4 Legal Entity type Ta 5 Adverse Information Yes To 4 Legal Entity type To 4 Legal Entity type To 4 Legal Entity type To 5 Adverse Information Yes To 6 Other (specify) PEP or PEP relate turnover, High avai To 5 Adverse Information Yes To 6 a If Y, Is this at: To 6 a If Y, Is this at: To 7 Adverse Information Yes To 8 Adverse Information Yes To 9 Adverse Media/Negative News? To 9 Adverse Media/Negative News? To What is the method used by the Entity to screen for Adverse Media/Negative News? To What is the method used by the Entity to screen for Adverse Media/Negative News? To What is the method used by PEPs? To Boes the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? To Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? To Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? To Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: 7 at Product Usage 7 a2 Product Usage 7 a3 Business Type/Industry 7 yes 7 a4 Legal Entity type 7 yes 7 a5 Adverse Information 7 a6 Other (specify) PEP or PEP relate turnover, High avai 8 For high risk non-individual customers, is a site visit a part of your KYC process? 8 a If Y, is this at: 8 a1 Onboarding 8 a2 KYC renewal 9 Yes 8 a3 Trigger event 9 Adverse Media/Negative News? 9 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 10 What is the method used by the Entity to screen for Adverse Media/Negative News? 11 a If Y, is this at: 12 Adverse Media/Negative News? 13 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 11 a If Y, is this at: 11 a1 Onboarding 12 Yes 13 Trigger event 14 Yes 15 KYC renewal 16 Yes 17 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 14 SKYC renewal 15 KYC renewal 16 Yes 17 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 15 Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 16 SKYC renewal at defined frequencies based on risk 17 Les 18 KYC renewed at defined frequencies based on risk 18 KYC renewed at defined frequencies based on risk	
Foreign and State Statistication Foreign and Statistication Foreign	
customer's risk classification? Select all that apply: 67 a1 Product Usage Yes 67 a2 Geography Yes 67 a3 Business Type/Industry Yes 67 a5 Business Type/Industry Yes 67 a5 Adverse Information Yes 67 a6 Other (specify) PEP or PEP relate turnover, High avai 68 For high risk non-individual customers, is a site visit a part of your KYC process? 68 a If Y, Is this at: 68 a1 Onboarding Yes 68 a2 KYC renewal Yes 68 a3 Trigger event 68 a4 Other 68 a4a Other 68 a4a Other 68 a4a If yes, please specify "Other" 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 69 a1 Fry, is this at: 69 a1 Onboarding Yes 69 a2 KYC renewal 69 a3 Trigger event 69 a1 Onboarding Yes 69 a2 KYC renewal 69 a2 KYC renewal 70 What is the method used by the Entity to screen for Adverse Media/Negative News? 71 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPS, or controlled by PEPS? 71 a If Y, is this at: 71 a1 Onboarding Yes 71 a2 KYC renewal 72 What is the method used by the Entity to screen PEPS? 73 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPS, or controlled by PEPS? 74 What is the method used by the Entity to screen PEPS? 75 Combination of automatical parties to determine whether they are PEPS, or controlled by PEPS? 76 What is the method used by the Entity to screen PEPS? 77 Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPS, or controlled by PEPS? 77 Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPS, or controlled by PEPS?	
67 a1 Product Usage Yes 67 a2 Geography Yes 67 a3 Business Type/Industry Yes 67 a4 Legal Entity type Yes 67 a5 Adverse Information Yes 67 a6 Other (specify) PEP or PEP relate turnover, High avai 68 For high risk non-individual customers, is a site visit a part of your KYC process? PEP or PEP relate turnover, High avai 68 a If Y, is this at: Yes 68 a1 Onboarding Yes 68 a2 KYC renewal Yes 68 a3 Trigger event Yes 68 a4 Other Yes 68 a4a Other Yes 68 a4a If yes, please specify "Other" Yes 69 a If Y, is this at: Yes 69 a1 Onboarding Yes 69 a2 KYC renewal Yes 69 a3 Trigger event Yes 70 What is the method used by the Entity to screen for Adverse Media/Negative News? Combination of aut 71	
67 a2 Geography 67 a3 Business Type/Industry 67 a4 Legal Entity type 67 a5 Adverse Information 68 For high risk non-individual customers, is a site visit a part of your KYC process? 68 a If Y, is this at: 68 a1 Onboarding 68 a2 KYC renewal 68 a2 KYC renewal 68 a4 Other 68 a4 Other 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 69 a1 If Y, is this at: 69 a1 Onboarding 69 Customers for Adverse Media/Negative News? 69 a2 KYC renewal 69 a3 Trigger event 70 What is the method used by the Entity to screen for Adverse Media/Negative News? 71 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 71 a If Y, is this at: 71 a1 Onboarding 72 What is the method used by the Entity to screen FEPs? 73 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 71 a If Y, is this at: 71 a1 Onboarding 72 What is the method used by the Entity to screen PEPs? 73 Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 74 Is KYC renewal Security Adversed the parties to determine whether they are PEPs, or controlled by PEPs? 75 Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 76 Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
67 a3 Business Type/Industry Yes	
67 a4 Legal Entity type Yes 67 a5 Adverse Information Yes 67 a6 Other (specify) PEP or PEP relate turnover, High avai 68 For high risk non-individual customers, is a site visit a part of your KYC process? 68 a1 Fy, is this at: 68 a1 Onboarding Yes 68 a2 KYC renewal Yes 68 a3 Trigger event Yes 68 a4 Other 68 a4 Other 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 69 a If Y, is this at: 69 a1 Onboarding Yes 69 a2 KYC renewal 70 What is the method used by the Entity to screen for Adverse Media/Negative News? 71 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 71 a If Y, is this at: 71 a1 Onboarding Yes 71 a2 KYC renewal Yes 71 a2 KYC renewal Yes 71 a2 Trigger event 72 What is the method used by the Entity to screen PEPs? 73 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 74 a If Y, is this at: 75 Trigger event 76 What is the method used by the Entity to screen PEPs? 77 Combination of autor Pess Pess Pess Pess Pess Pess Pess Pes	
67 a6 Other (specify) 68 PEP or PEP relate turnover, High avai 68 For high risk non-individual customers, is a site visit a part of your KYC process? 68 a If Y, is this at: 68 a1 Onboarding Yes 68 a2 KYC renewal Yes 68 a4 Other 68 a4 Other 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 69 a If Y, is this at: 69 a1 Onboarding Yes 69 a2 KYC renewal Yes 69 a2 If Y, is this at: 69 a1 Onboarding Yes 69 a2 If Y, is this at: 69 a1 Onboarding Yes 69 a2 KYC renewal Yes 70 What is the method used by the Entity to screen for Adverse Media/Negative News? 71 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 71 a If Y, is this at: 71 a1 Onboarding Yes 71 a2 KYC renewal 71 a2 KYC renewal 71 a3 Trigger event 72 What is the method used by the Entity to screen PEPs? 73 Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 74 Is KYC renewed at defined frequencies based on risk 75 Ves 76 Ves 77 Is KYC renewed at defined frequencies based on risk	
68	
68 For high risk non-individual customers, is a site visit a part of your KYC process? 68 a If Y, is this at: 68 a1 Onboarding Yes 68 a2 KYC renewal Yes 68 a4 Other 68 a4 Other 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 69 a1 Onboarding Yes 69 a1 Onboarding Yes 69 a1 Onboarding Yes 69 a2 KYC renewal Yes 69 a1 Onboarding Yes 69 a2 KYC renewal Yes 69 a2 KYC renewal Yes 69 a3 Trigger event Yes 69 a0 Frigger event Yes 69 a1 Onboarding Yes 69 a2 KYC renewal Yes 69 a3 Trigger event Yes 70 What is the method used by the Entity to screen for Adverse Media/Negative News? 71 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 71 a If Y, is this at: 71 a1 Onboarding Yes 71 a2 KYC renewal Yes 71 a2 KYC renewal Yes 71 a3 Trigger event 72 What is the method used by the Entity to screen PEPs? 73 Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 74 Is KYC renewed at defined frequencies based on risk Yes 75 Is KYC renewed at defined frequencies based on risk	
part of your KYC process? 88 a	or otherwise close associates of PEPs, Complex shareholders structure, High accounts ble balance in private individual accounts.
68 a	
68 a1	
68 a2	
68 a3 Trigger event 68 a44 Other 68 a44 If yes, please specify "Other" 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 69 a If Y, is this at: 69 a1 Onboarding Yes 69 a2 KYC renewal Yes 69 a2 KYC renewal Yes 69 a3 Trigger event Yes 70 What is the method used by the Entity to screen for Adverse Media/Negative News? 71 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 71 a If Y, is this at: 71 a1 Onboarding Yes 71 a2 KYC renewal Yes 71 a3 Trigger event 72 What is the method used by the Entity to screen PEPs? 73 Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 74 Is KYC renewed at defined frequencies based on risk	
68 a44 If yes, please specify "Other" Open Customers for Adverse Media/Negative News? 69 a If Y, is this at: 69 a1 Onboarding Yes 69 a2 KYC renewal Yes 69 a3 Trigger event 70 What is the method used by the Entity to screen for Adverse Media/Negative News? The component of t	
69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 69 a If Y, is this at: 69 a1 Onboarding Yes 69 a2 KYC renewal 69 a2 KYC renewal 69 a3 Trigger event 70 What is the method used by the Entity to screen for Adverse Media/Negative News? Combination of auto 71 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 71 a If Y, is this at: 71 a1 Onboarding Yes 71 a2 KYC renewal 72 What is the method used by the Entity to screen PEPs? Combination of auto 73 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? The Street Peps of Combination of auto 73 Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 74 Is KYC renewed at defined frequencies based on risk	
customers for Adverse Media/Negative News? 69 a1	
69 at	
69 a2	
Trigger event Yes	
What is the method used by the Entity to screen for Adverse Media/Negative News?	
Adverse Media/Negative News? 71 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 71 a If Y, is this at: 71 a1 Onboarding Yes 71 a2 KYC renewal Yes 71 a3 Trigger event Yes 72 What is the method used by the Entity to screen PEPs? 73 Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 74 Is KYC renewed at defined frequencies based on risk	
customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 71 a	nated and manual
71 a1	
71 a1	
71 a3 Trigger event Yes	
71 a3	
73 Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 74 Is KYC renewed at defined frequencies based on risk	
to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 74 Is KYC renewed at defined frequencies based on risk	
	nated and manual
rating (Periodic Reviews)?	nated and manual
74 a If yes, select all that apply:	nated and manual
74 a1 Less than one year	nated and manual
74 a2 1 – 2 years	nated and manual
74 a3 3 – 4 years	nated and manual
74 a4 5 years or more	nated and manual
74 a5 Trigger-based or perpetual monitoring reviews	nated and manual
74 a6 Other (Please specify) For high-risk clients risk of ML - once ex	nated and manual

	T	
75	Does the Entity maintain and report metrics on current	
	and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or	
	industries are subject to EDD and/or are restricted, or	
	prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Prohibited
76 b	Respondent Banks	Do not have this category of customer or industry
76 b1	If EDD or restricted, does the EDD assessment	Bo not have this dategory or distance or industry
70 01	contain the elements as set out in the Wolfsberg	
	Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	EDD on risk-based approach
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	EDD on risk-based approach
	Marijuana-related Entities	Prohibited
76 g		
76 h	MSB/MVTS customers	EDD on risk-based approach
76 i	Non-account customers	EDD on risk-based approach
76 j	Non-Government Organisations	Always subject to EDD
76 k	Non-resident customers	EDD on risk-based approach
76 I	Nuclear power	Prohibited
76 m	Payment Service Providers	EDD on risk-based approach
76 n	PEPs	Always subject to EDD
76 o	PEP Close Associates	Always subject to EDD
76 p	PEP Related	Always subject to EDD
76 q	Precious metals and stones	EDD on risk-based approach
76 r	Red light businesses/Adult entertainment	Prohibited
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	Always subject to EDD
76 v	Unregulated charities	Prohibited
76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers	Prohibited
76 y	Other (specify)	
	(4 - 2)	
77	If restricted, provide details of the restriction	
		The Bank has an Exclusion list which describes the activities and the clients with which the Bank shall no enter
		or maintain a business relationship. Please find the full list following the link
		https://www.procreditbank.md/files/docs/2020/iulie%202020/Exclusion%20list%2C%20july%202020.pdf
78	Does EDD require senior business management and/or	
10		Yes
70.0	compliance approval? If Y indicate who provides the approval:	
78 a 79	Does the Entity have specific procedures for onboarding	
13	entities that handle client money such as lawyers,	L.
	accountants, consultants, real estate agents?	Yes
80	Does the Entity perform an additional control or quality	Yes
	review on clients subject to EDD?	
81	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	
81 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
	Wasanan data and the constitution of the const	
82	If appropriate, provide any additional information/context	
	to the answers in this section.	
	II.	

	Book the English of Salahara despite a control of the Control of t	
83	Does the Entity have risk based policies, procedures and	M.
	monitoring processes for the identification and reporting	Yes
•	of suspicious activity? What is the method used by the Entity to monitor	
84	transactions for suspicious activities?	Automated
84 a	If manual or combination selected, specify what type	
	of transactions are monitored manually	
84 b	If automated or combination selected, are internal	Both
	system or vendor-sourced tools used?	
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what	
	is the name of the vendor/tool?	Siron Anti-Financial Crime Solutions from IMTF Siron GmbH. Germany
		Olon Anti i manola onine ocidaona non mini olion onia i, ocimany
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction	N T your
04 D3	Monitoring application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report	Yes
	suspicious transactions?	
85 a	If Y, does the Entity have policies, procedures and	W.
	processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes	
00	to review and escalate matters arising from the	W.
	monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management	
01	programme to ensure that complete data for all	Yes
	transactions are subject to monitoring?	
88	Does the Entity have processes in place to respond to	
	Request For Information (RFIs) from other entities in a	Yes
	timely manner?	
89	Does the Entity have processes in place to send	
	Requests for Information (RFIs) to their customers in a	Yes
	timely manner?	
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to	
90 a	and the branch/es that this applies to	
	and the branches that this applies to	
91	If appropriate, provide any additional information/context	
-	to the answers in this section.	

9. PAYN	IENT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	Law 308 of 22 December 2017 on prevention and combating money laundering and terrorism financing
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	

10. SANC	PIONE	
98	Does the Entity have a Sanctions Policy approved by	
30	management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at	Yes
	foreign financial institutions?	
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Automated
102 a	f 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	REFINITIV WORLD-CHECK ONE - Refinitiv Risk Intelligence
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Automated
105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional 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 for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	

11. TRAINING & EDUCATION 111 Does the Entity pro Does the Entity provide mandatory training, which includes: uces: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, 111 a 111 b Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Yes 111 c 111 d Yes 111 e 111 f 112 112 a 112 b 112 c Yes Yes Is the above mandatory training provided to : Board and Senior Committee Management 1st Line of Defence Yes Yes 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Yes Not Applicable 112 f 113 Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities? Does the Entity provide customised training for AML, CTF and Sanctions staff? If Y, how frequently is training delivered? 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. 114 114 a 115 Annually Yes 115 a If appropriate, provide any additional information/context 116

to the answers in this section.

12. QUALITY ASSURANCE /COMPLIANCE TESTING			
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes	
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes	
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
120	If appropriate, provide any additional information/context to the answers in this section.		

13. AUDIT		
121	In addition to inspections by the government	
	supervisors/regulators, does the Entity have an internal	
	audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC,	Yes
	Fraud and Sanctions policies and practices on a regular	
	basis?	
122	How often is the Entity audited on its AML, CTF, ABC,	
122	Fraud and Sanctions programme by the following:	
400 -		V. carl.
122 a	Internal Audit Department External Third Party	Yearly
122 b		Yearly
123	Does the internal audit function or other independent	
123 a	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and	
123 a	procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 C	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 g	Technology	Yes
123 i	Transaction Monitoring	Yes
	Transaction Screening including for sanctions	
123 j 123 k	Training & Education	Yes
123 K		Yes
1231	Other (specify)	
124	Are adverse findings from internal & external audit	
	tracked to completion and assessed for adequacy and	Yes
125	completeness? Confirm that all responses provided in the above section	
.20	are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
100	Warranger and the second second	
126	If appropriate, provide any additional information/context	
	to the answers in this section.	
14. FRAUI	n e	
127	Does the Entity have policies in place addressing fraud	
	risk?	Yes
128	Does the Entity have a dedicated team responsible for	
	preventing & detecting fraud?	Yes
129	Does the Entity have real time monitoring to detect	W
	fraud?	Yes
130	Do the Entity's processes include gathering additional	
	information to support its fraud controls, for example: IP	Yes
	address, GPS location, and/or device ID?	
131	Confirm that all responses provided in the above section	
131	are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to	
101 4	and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context	
	to the answers in this section.	
D I 1' -	01-1	
Declaratio	on Statement	
14/-16-1	O	222220144.0
	oup Correspondent Banking Due Diligence Questionnaire 2023 (Correspondent Banking Due Diligence 2023 (Correspondent Banking Due	BDDQ V1.4) g or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering,
	ance Officer, Global Head of Financial Crimes Compliance OR eq	
Office Compile	ance officer, Global Ficad of Financial offines compilance of eq	uvacity
CB ProCre	edit Bank JSC (Financial Institution name) is fully commit	ted 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.
I		
	Institution understands the critical importance of having effective	and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory
obligations.		
The Financial	Institution recognises the importance of transparency recording	parties to transactions in international payments and has adopted/is committed to adopting these standards.
me mandal	manuation recognises the importance of transparency regarding (латов то панвавноть ин инегнацина раутеть ани нав аворешть соптишей to adopting these standards.
The Financial	Institution further certifies it complies with / is working to comply	with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided
	erg CBDDQ will be kept current and will be updated no less frequ	
The Financial	Institution commits to file accurate supplemental information on	a timely basis.
	••	
I		
		valent), 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 to	nis deciaration on dehalf of the Financial Institution.
l Oleges	Melnicova (MLRO or equivalent) certify that I have road on	d understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest
	Meinicova (MLRO or equivalent), certify that I have read and at I am authorised to execute this declaration on behalf of the Fina	
sonor, and the	a aaonaed to execute this decidaration on behalf of the Fills	HOME HOMESTON
	(Signature & Date)	
1		
	(Signature & Date)	