the Wolfsberg Group

Financial Institution Name: Location (Country) : JOINT STOCK COMPANY "FIRST UKRAINIAN INTERNATIONAL BANK" Ukraine

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

No#	Question	Answer
	& OWNERSHIP	,
1	Full Legal Name	
		JOINT STOCK COMPANY "FIRST UKRAINIAN INTERNATIONAL BANK"
		SOLVE OF COME AND TIME ON CANADA INTERNATIONAL BANK
2	Append a list of foreign branches which are covered by	
	this questionnaire	
3	Full Legal (Registered) Address	
		A Andribular de Jória 04070 Illiania
		4 Andriivska str., Kyiv, 04070, Ukraine
4	Full Primary Business Address (if different from above)	
-	and thinking Business Address (if different from above)	
5	Date of Entity incorporation/establishment	
		22 42 4004
		23.12.1991
6	Select type of ownership and append an ownership chart if	
·	available	
0 -		N-
6 a 6 a1	Publicly Traded (25% of shares publicly traded) If Y, indicate the exchange traded on and ticker symbol	No
бат	ir f, 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	
	beneficial owners with a holding of 10% or more	LIMITED LIABILITY COMPANY "SCM FINANCE" ("SCM FINANCE", LLC) - 92,34% (direct);
		LIMITED LIABILITY COMPANY "SYSTEM CAPITAL MANAGEMENT" (LLC "SCM") – 92,42% (indirect);
		Akhmetov Rinat Leonidovych – 100% (indirect).
7	0/, of the Entity's total charge composed of hearer charge	
1	% of the Entity's total shares composed of bearer shares	
		None
8	Does the Entity, or any of its branches, operate under an	Ne
	Offshore Banking License (OBL)?	No
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	
	Traine S. primary interioral regulator/supervisory autilities	
		National Bank of Ukraine
11	Provide Legal Entity Identifier (LEI) if available	
		254000LOVSVM7IC0SA20
		254900LOKSXM7IC0SA30
12	Provide the full legal name of the ultimate parent (if	
14	different from the Entity completing the DDQ)	
	amorona non the Entity completing the DDQ)	LIMITED LIABILITY COMPANY "SYSTEM CAPITAL MANAGEMENT"

13	Jurisdiction of licensing authority and regulator of ultimate	
	parent	
		Ukraine
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b	Private Banking	Yes
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	Yes
14 i	Multilateral Development Bank	No
	Wealth Management	
14 j		No
14 k	Other (please explain)	
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.	
	. SS. SSIR OUDIOINOIS AND ISSUED.	
16	Select the closest value:	
	Number of employees	5001-10000
16 a		
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches.	Tes
17 a	If N, clarify which questions the difference/s relate to and	
17 a	the branch/es that this applies to.	
	the branchies that this applies to.	
18	If appropriate provide any additional information/contact to	
10	If appropriate, provide any additional information/context to	
	the answers in this section.	
	1070 A GEDVIGEO	
	ICTS & SERVICES	
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	Yes
19 a1	lf Y	
19 a1a	Does the Entity offer Correspondent Banking services	
		Yes
10 015	to domestic banks?	
19 a1b	Does the Entity allow domestic bank clients to provide	No
	downstream relationships?	
19 a1c	Does the Entity have processes and procedures in	L.
	place to identify downstream relationships with	Yes
	domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking services	Vec
	to foreign banks?	Yes
19 a1e	Does the Entity allow downstream relationships with	
-	foreign banks?	No
19 a1f	Does the Entity have processes and procedures in	
	place to identify downstream relationships with foreign	Yes
	. , , , , , , , , , , , , , , , , , , ,	169
40.54=	banks?	
19 a1g	Does the Entity offer Correspondent Banking services	
	to regulated Money Services Businesses	Yes
	(MSBs)/Money Value Transfer Services (MVTSs)?	
19 a1h	Does the Entity allow downstream relationships with	
	MSBs, MVTSs, or Payment Service Provider (PSPs)?	
	IVIODS, IVIV 105, OF FAYINGIL SERVICE FIDVIDER (PSPS)?	
		lu-
40 -41 4		
19 a1h1	MSBs	No .
19 a1h2	MVTSs	No

19 a1i	Does the Entity have processes and procedures in	
	place to identify downstream relationships with MSBs	Yes
		169
	/MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	Yes
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 customers?	
	offer third party payment services to their customers?	Yes
40.14	1637 1 1 1 1 1 1 1 1 1 1 1 1	
19 i1	If Y , please select all that apply below?	
19 i2	Third Party Payment Service Providers	Yes
19 i3	Virtual Asset Service Providers (VASPs)	No
19 i4	eCommerce Platforms	Yes
		Tes .
19 i5	Other - Please explain	
		Payment Facilitator (PayFac)
10 i	Private Banking	Both
19 j		
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 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	
	Wire transfers	V
19 p2		Yes
19 p2a	If yes, state the applicable level of due diligence	Identification and Verification
19 p3	Foreign currency conversion	Yes
19 p3a	If yes, state the applicable level of due diligence	Identification and Verification
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	
	If you offer other services to walk-in customers please	
19 p5		
	provide more detail here, including describing the level	
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19 p5	provide more detail here, including describing the level of due diligence.	
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19 p5	provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the	
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22 m 22 n	Suspicious Activity Reporting	Yes Vec
22 n 22 o	Training and Education Transaction Monitoring	Yes Yes
23	How many full time employees are in the Entity's AML,	
	CTF & Sanctions Compliance Department?	101-500
24	Is the Entity's AML, CTF & Sanctions policy approved at	
	least annually by the Board or equivalent Senior	Yes
	Management Committee? If N, describe your practice in 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	No
	components of its AML, CTF & Sanctions programme?	
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
28 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to	
	the answers in this section.	Q26: The Bank does not fully transfer any of the components specified in paragraph 22, but involves third parties on
		a contractual basis for the initial identification / verification of a potential client in the process of applying for
		consumer loans, the rest is done by the Bank independently.
4. ANTI B	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and	Yes
	requirements to reasonably prevent, detect and report	
31	bribery and corruption? Does the Entity have an enterprise wide programme that	
٠.	sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers	
	with sufficient experience/expertise responsible for	Yes
	coordinating the ABC programme?	
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC	Yes
	programme?	165
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This	
	includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	Yes
	improperly intended to influence action or obtain an	165
	advantage	
35 b	Includes enhanced requirements regarding interaction	Yes
25	with public officials?	
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any	
	other policy applicable to the Legal Entity)?	Yes
	- 1.5. pone, approado to the Logal Linky):	
26	Door the Entity have controls in all the results of	
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular	
	reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment	
	(EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was	
	completed.	
39	Does the Entity have an ABC residual risk rating that is the	
	net result of the controls effectiveness and the inherent	Yes
40	risk assessment? Does the Entity's ABC EWRA cover the inherent risk	
40	components detailed below:	
40 a	Potential liability created by intermediaries and other third	Ves
	party providers as appropriate	100
40 b	Corruption risks associated with the countries and	Voc
	industries in which the Entity does business, directly or through intermediaries	Yes
40 c	Transactions, products or services, including those that	
-	involve state-owned or state-controlled entities or public	Yes
-	officials	

40 d	Corruption risks associated with gifts and hospitality,	
	hiring/internships, charitable donations and political	Yes
		100
	contributions	
40 e	Changes in business activities that may materially	Yes
	increase the Entity's corruption risk	103
41	Does the Entity's internal audit function or other	
	independent third party cover ABC Policies and	Yes
	Procedures?	
42		
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		1 00
42 e	Third parties to which specific compliance activities	Not Applicable
	subject to ABC risk have been outsourced	
42 f	Non-employed workers as appropriate	Yes
	(contractors/consultants)	103
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	
		Yes
44 :	are representative of all the LE's branches	
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.	
	and anomore in the deciden.	
	TE & CANOTIONS BOLISIES & BROSERUBES	
	CTF & SANCTIONS POLICIES & PROCEDURES	
5. AML, C	Has the Entity documented policies and procedures	
	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions	
	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent,	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 46 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering	Yes
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	Yes Yes
46 46 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering	
46 a 46 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations	Yes Yes
46 a 46 b 46 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least	Yes
46 a 46 b 46 c 47	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually?	Yes Yes
46 a 46 b 46 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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	Yes Yes
46 a 46 b 46 c 47	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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 Yes
46 a 46 b 46 c 47 48	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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 Yes Yes
46 a 46 b 46 c 47	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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 Yes
46 a 46 b 46 c 47 48	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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 Yes Yes
46 a 46 b 46 c 47 48 48 a 48 a 1 48 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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 a 46 b 46 c 47 48 48 a 48 a 48 b 48 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b 48 b1 49	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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:	Yes Yes Yes Yes Yes Yes Yes Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 b 48 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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	Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b 48 b1 49	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b 49	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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	Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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
46 a 46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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	Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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	Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 b 49 b 49 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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 a 46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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/relationships with shell banks	Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 b 49 b 49 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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 a 46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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/relationships with shell banks	Yes
46 a 46 b 46 c 47 48 48 a 48 a1 48 b1 49 a 49 c 49 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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 oping 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	Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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 opening and keeping of accounts for Section 311	Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d 49 e	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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 another entity that provides services to shell banks Prohibit opening and keeping of accounts for 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
46 a 46 b 46 c 47 48 48 a 48 a1 48 b1 49 a 49 c 49 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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 opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d 49 e	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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 opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges	Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d 49 e	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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 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 unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money	Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d 49 e	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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 opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges	Yes
46 a 46 b 46 c 47 48 48 a 48 a1 48 b 48 b1 49 a 49 c 49 d 49 e 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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 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 unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money	Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d 49 e	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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 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 unlicensed/unregulated femilitance agents, exchanges houses, case de cambio, bureaux de change or money transfer agents Assess the risks of relationships with domestic and	Yes
46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 a 49 b 49 c 49 c 49 d 49 e 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 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 another entity that provides services to shell banks Prohibit opening and keeping of accounts for 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 unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes Yes

491 Define the processe for exclusing filterance of the process of the proposed and the process of the process	40 i		
Issuesplotestably supposes and very feetfact by employees 49 Define the process, where appropriate for terminating outside the process for extiling cleants for financial crime in account that applies around profit of the process for extiling cleants for financial crime resonant that applies around profit of the process and carbodies to signify and handle such as the stage of the process and carbodies to signify and handle such as the stage of the process and carbodies to signify and handle such as the stage of the process and carbodies to signify and handle such as the process and carbodies to signify and handle such as the process and carbodies to signify and handle such as the process and carbodies to signify and handle such as the process and carbodies of the process and carbodies to signify and handle such as the process and carbodies to signify and handle such as the process for the maintenance of internal value from the process for the maintenance of internal value from the process for the maintenance of internal value from the process for the maintenance of internal value from the process for the maintenance of internal value from the process for the maintenance of internal value from the process for the maintenance of internal value from the process for the maintenance of internal value from the process for the maintenance of internal value from the process for the maintenance of internal value from the process for the maintenance of internal value from the process for the maintenance of internal value from the process for the maintenance of internal value from the process for the maintenance of internal value from the process for the maintenance of internal value from the process for the maintenance of internal value from the process for the maintenance of internal value from the process for the maintenance of internal value from the process for the process	47 I	Define the process for escalating financial crime risk	
employees 49 Cere the process, where appropriate, for forminating obtaining outside process, where appropriate, for forminating obtaining outside formation crime in the process of the entry, including foreign beautiful to be processed outside to identify and handle processed outside the proc			Yes
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Define the process for exiting clients for financial crime reasons that applies across the only, including foreign by a comparing the process and comparing for parallel conditioners has weep previously exited for financial crime reasons fifth a post of the control is a leaferty and name to control the process and control is a leaferty and name to control in the process of the pr	49 j		
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customers that were previously existed for financial crime reasons! They seek to re-establish a relationship. 49 m			
reasons if they seek for re-establish a realizonship 49 m Outline the processes regarding screening for sanctions, PEPs and Adverse MedialNegative News 40 n Outline the processes for the maintenance of internal Authorities' Has the Entity define a risk tolerance statement or similar business' 10 Does the Entity have record refereinton procedures that comply with applicable laws? 11 Confirm that all responses provided in the above Section are representative of all the LE's branches 12 Confirm that all responses provided in the above Section are representative of all the LE's branches 13 If Y, what is the referrition period? 14 Section are representative of all the LE's branches 15 a If Y, what is the referrition period? 15 Years or more 16 AMIL, CTF & SANCTIONS RISK ASSESSMENT 16 Does the Entity's AMIL & CTF EVIPA cover the inherent finish components detailed below: 15 A Company 15 A Company 16 A Company 17 A Company 18 A Company 18 A Company 19 A	49 I		
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PEPs and Adverse MedianNegative News 9		reasons if they seek to re-establish a relationship	165
PEPs and Adverse MedianNegative News 9			
PEPs and Adverse Media/Negative News 763 764 765 765 765 765 765 765 765	49 m	Outline the processes regarding screening for sanctions	
49 n	45 111		Yes
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51 a			Yes
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Section		risk components detailed below:	
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S5 b Customer Due Diligence Yes			
S5 c PEP Identification Yes		Ü	
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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? 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:	55 d		
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S5 g Governance Yes		Transaction Screening	Yes
Management Information Yes	55 e	Transaction Screening Name Screening against Adverse Media/Negative News	Yes Yes
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If N, provide the date when the last AML & CTF EWRA was completed.	55 e 55 f 55 g 55 h	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	Yes Yes Yes Yes Yes Yes
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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:	55 e 55 f 55 g 55 h 56	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes Yes Yes Yes Yes Yes
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:	55 e 55 f 55 g 55 h 56	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA	Yes Yes Yes Yes Yes Yes
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:	55 e 55 f 55 g 55 h 56	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA	Yes Yes Yes Yes Yes Yes
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:	55 e 55 f 55 g 55 h 56	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA	Yes Yes Yes Yes Yes Yes
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:	55 e 55 f 55 g 55 h 56	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA	Yes Yes Yes Yes Yes Yes
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:	55 e 55 f 55 g 55 h 56	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes Yes Yes Yes Yes Yes
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:	55 e 55 f 55 g 55 h 56	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk	Yes Yes Yes Yes Yes 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:	55 e 55 f 55 g 55 h 56	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk	Yes Yes Yes Yes Yes Yes
57 c Channel Yes 57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	55 e 55 f 55 g 55 h 56 56 a	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes Yes Yes Yes Yes Yes Yes Yes
57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	55 e 55 f 55 g 55 h 56 56 a	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes Yes Yes Yes Yes Yes Yes Yes Yes
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effectiveness components detailed below:	55 e 55 f 55 g 55 h 56 56 a 57 57 a 57 b 57 c	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
	55 e 55 f 55 g 55 h 56 56 a 57 57 a 57 b 57 c 57 d	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
	55 e 55 f 55 g 55 h 56 56 a 57 57 a 57 b 57 c 57 d	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
	55 e 55 f 55 g 55 h 56 56 a 57 57 a 57 c 57 d	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	Yes
	55 e 55 f 55 g 55 h 56 56 a 57 57 a 57 c 57 d 58	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
	55 e 55 f 55 g 55 h 56 56 a 57 57 a 57 b 57 c 57 d 58 58 a	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
	55 e 55 f 55 g 55 h 56 56 a 57 a 57 c 57 d 58 a 58 a 58 b	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes
58 d Management Information Yes	55 e 55 f 55 g 55 h 56 56 a 57 a 57 a 57 c 57 d 58 58 a 58 b 58 c	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance List Management	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	
00	last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA	
59 a		
	was completed.	
60	Confirm that all responses provided in the above Section	
00	are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to and	
ой а	, ,	
	the branch/es that this applies to.	
61	If appropriate, provide any additional information/context to	
01	the answers in this section.	
	the answers in this section.	
7 KVC CD	DD and EDD	
		Vaa
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when CDD	
	must be completed, e.g. at the time of onboarding or within	Yes
	30 days?	
64	Which of the following does the Entity gather and retain	
	when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
	Source of runds Source of wealth	
64 h		Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied to	
	beneficial ownership identification?	Other (Specify the percentage)
67	Does the due diligence process result in customers	
0.	receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the	
01 4	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 a5	Adverse Information	Yes
67 a6	Other (specify)	
		Presence of the client in the list of subjects of international and / or local sanctions, identification of the client as
		PEP; use of a set of criteria / indicators established by national legislation.
		,
68	For high risk non-individual customers, is a site visit a part	Yes
	of your KYC process?	
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4	Other	No
68 a4a	If yes, please specify "Other"	
	,, pp, 5 4.16.	
69	Does the Entity have a risk based approach to screening	
	customers for Adverse Media/Negative News?	Yes
	Sacramon for Advoice Media/Negative News:	
69 a	If Y, is this at:	
		Von
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

69 a3		15.
	Trigger event	Yes
70	What is the method used by the Entity to screen for	Combination of automated and manual
74	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?	Yes
	uney are FEFS, or controlled by PEPS?	
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a2 71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	
12	What is the method used by the Entity to screen i Er 3:	Combination of automated and manual
73	Does the Entity have policies, procedures and processes	
	to review and escalate potential matches from screening	
	customers and connected parties to determine whether	Yes
	they are PEPs, or controlled by PEPs?	
	1,100	
74	Is KYC renewed at defined frequencies based on risk	Yes
	rating (Periodic Reviews)?	
74 a	If yes, select all that apply:	V
74 a1	Less than one year	Yes
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4 74 a5	5 years or more Trigger-based or perpetual monitoring reviews	Yes Yes
		Yes
74 a6	Other (Please specify)	
75	Does the Entity maintain and report metrics on current	
	and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or	
	industries are subject to EDD and/or are restricted, or	
	prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Always subject to EDD
76 b	Respondent Banks	Always subject to EDD
76 b1	If EDD or restricted, does the EDD assessment	· ·
	contain the elements as set out in the Wolfsberg	Yes
	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
76 g		ID 122 1
	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	Always subject to EDD
	MSB/MVTS customers Non-account customers	Always subject to EDD EDD on risk-based approach
76 h 76 i 76 j	MSB/MVTS customers Non-account customers Non-Government Organisations	Always subject to EDD EDD on risk-based approach Always subject to EDD
76 h 76 i 76 j 76 k	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers	Always subject to EDD EDD on risk-based approach Always subject to EDD EDD on risk-based approach
76 h 76 i 76 j	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power	Always subject to EDD EDD on risk-based approach Always subject to EDD EDD on risk-based approach Always subject to EDD
76 h 76 i 76 j 76 k 76 l 76 m	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 Always subject to EDD EDD on risk-based approach Always subject to EDD Always subject to EDD
76 h 76 i 76 j 76 k 76 l 76 m 76 n	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs	Always subject to EDD EDD on risk-based approach Always subject to EDD EDD on risk-based approach Always subject to EDD Always subject to EDD EDD on risk-based approach EDD on risk-based approach
76 h 76 i 76 j 76 k 76 l 76 m	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 Always subject to EDD EDD on risk-based approach Always subject to EDD Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p	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 Always subject to EDD EDD on risk-based approach Always subject to EDD Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach
76 h 76 i 76 j 76 k 76 l 76 n 76 o 76 p 76 q	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 Always subject to EDD EDD on risk-based approach Always subject to EDD Always subject to EDD EDD on risk-based approach
76 h 76 i 76 j 76 k 76 m 76 n 76 o 76 p 76 q 76 r	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment	Always subject to EDD EDD on risk-based approach Always subject to EDD EDD on risk-based approach Always subject to EDD Always subject to EDD EDD on risk-based approach
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 r 76 s	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities	Always subject to EDD EDD on risk-based approach Always subject to EDD EDD on risk-based approach Always subject to EDD Always subject to EDD EDD on risk-based approach Always subject to EDD
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 c 76 c 76 c 76 c 76 c	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks	Always subject to EDD EDD on risk-based approach Always subject to EDD EDD on risk-based approach Always subject to EDD Always subject to EDD EDD on risk-based approach
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 t	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies	Always subject to EDD EDD on risk-based approach Always subject to EDD EDD on risk-based approach Always subject to EDD Always subject to EDD EDD on risk-based approach
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 t	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities	Always subject to EDD EDD on risk-based approach Always subject to EDD EDD on risk-based approach Always subject to EDD Always subject to EDD EDD on risk-based approach Always subject to EDD
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers	Always subject to EDD EDD on risk-based approach Always subject to EDD EDD on risk-based approach Always subject to EDD Always subject to EDD EDD on risk-based approach Prohibited Always subject to EDD Prohibited EDD on risk-based approach Always subject to EDD
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 v 76 v 76 w	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Always subject to EDD EDD on risk-based approach Always subject to EDD EDD on risk-based approach Always subject to EDD Always subject to EDD EDD on risk-based approach Always subject to EDD
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers	Always subject to EDD EDD on risk-based approach Always subject to EDD EDD on risk-based approach Always subject to EDD Always subject to EDD EDD on risk-based approach Prohibited Always subject to EDD Prohibited EDD on risk-based approach Always subject to EDD
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 v 76 v 76 w	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Always subject to EDD EDD on risk-based approach Always subject to EDD EDD on risk-based approach Always subject to EDD Always subject to EDD EDD on risk-based approach Prohibited Always subject to EDD Prohibited EDD on risk-based approach Always subject to EDD
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 v 76 v 76 w	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Always subject to EDD EDD on risk-based approach Always subject to EDD EDD on risk-based approach Always subject to EDD Always subject to EDD EDD on risk-based approach Prohibited Always subject to EDD Prohibited EDD on risk-based approach Always subject to EDD
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 v 76 v 76 w	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Always subject to EDD EDD on risk-based approach Always subject to EDD EDD on risk-based approach Always subject to EDD Always subject to EDD EDD on risk-based approach Prohibited Always subject to EDD Prohibited EDD on risk-based approach Always subject to EDD
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 t 76 v 76 w 76 v	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Always subject to EDD EDD on risk-based approach Always subject to EDD EDD on risk-based approach Always subject to EDD Always subject to EDD EDD on risk-based approach Prohibited Always subject to EDD Prohibited EDD on risk-based approach Always subject to EDD
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 v 76 v 76 w	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Always subject to EDD EDD on risk-based approach Always subject to EDD EDD on risk-based approach Always subject to EDD Always subject to EDD EDD on risk-based approach Prohibited Always subject to EDD Prohibited EDD on risk-based approach Always subject to EDD
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 t 76 v 76 w 76 v	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Always subject to EDD EDD on risk-based approach Always subject to EDD EDD on risk-based approach Always subject to EDD Always subject to EDD EDD on risk-based approach Prohibited Always subject to EDD Prohibited EDD on risk-based approach Always subject to EDD
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 t 76 v 76 w 76 v	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Always subject to EDD EDD on risk-based approach Always subject to EDD EDD on risk-based approach Always subject to EDD Always subject to EDD EDD on risk-based approach Prohibited Always subject to EDD Prohibited EDD on risk-based approach Always subject to EDD
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 v 76 w 76 x 76 y	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify) If restricted, provide details of the restriction	Always subject to EDD EDD on risk-based approach Always subject to EDD EDD on risk-based approach Always subject to EDD Always subject to EDD EDD on risk-based approach Prohibited Always subject to EDD Prohibited EDD on risk-based approach Always subject to EDD
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 t 76 v 76 w 76 v	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify) If restricted, provide details of the restriction Does EDD require senior business management and/or	Always subject to EDD EDD on risk-based approach Always subject to EDD EDD on risk-based approach Always subject to EDD Always subject to EDD EDD on risk-based approach Prohibited Always subject to EDD Prohibited EDD on risk-based approach Always subject to EDD
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 v 76 w 76 x 76 y	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify) If restricted, provide details of the restriction	Always subject to EDD EDD on risk-based approach Always subject to EDD EDD on risk-based approach Always subject to EDD Always subject to EDD EDD on risk-based approach Always subject to EDD Prohibited Always subject to EDD Prohibited EDD on risk-based approach Always subject to EDD EDD on risk-based approach Always subject to EDD EDD on risk-based approach Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry

78 a	If Y indicate who provides the approval:	Both
79	Does the Entity have specific procedures for onboarding	Dour
-	entities that handle client money such as lawyers,	No
	accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or quality	
	review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	165
81 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to	
82	If appropriate, provide any additional information/context to	000 Ti D
	the answers in this section.	Q66:The Bank does not set a minimum ownership threshold, but checks the ownership structure to identify all actua beneficial owners-natural personi who exercise decisive influence (control) over the activities of the client and / or
		the natural person on whose behalf the financial transaction is carried out.
		and natural person on whose behalf the infantial transaction is carried out.
8. MONITO	RING & REPORTING	
83	Does the Entity have risk based policies, procedures and	
	monitoring processes for the identification and reporting of	Yes
	suspicious activity?	
84	What is the method used by the Entity to monitor	Combination of automated and manual
84 a	transactions for suspicious activities? If manual or combination selected, specify what type of	
J-7 U	transactions are monitored manually	Depositing/ withdrawals of significant amounts of cash at the Bank's cash desk exceeding UAH 400 000 (or
	an an additional and management	equivalent), transactions of non- residents legal entities, transactions in foreign currency above UAH 400 000 in
		equivalent
04.5		
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Internal System
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the	
	name of the vendor/tool?	
84 b2	When was the tool last updated?	
	•	
84 b3	When was the automated Transaction Monitoring application last calibrated?	
85	Does the Entity have regulatory requirements to report	
	suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and	
	processes to comply with suspicious transaction	Yes
	reporting requirements?	
86	Does the Entity have policies, procedures and processes	
	to review and escalate matters arising from the monitoring	Yes
	of customer transactions and activity?	
87	Does the Entity have a data quality management	Von
	programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to	
30	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 timely	Yes
	manner?	
90	Confirm that all responses provided in the above Section	Yes
90 a	are representative of all the LE's branches If N, clarify which questions the difference/s relate to and	
3 0 u	the branch/es that this applies to	
01	If appropriate provide any additional information/contact to	
91	If appropriate, provide any additional information/context to the answers in this section.	
	and anomolo in this section.	
a B.:::::::	IT TO ANODADENOV	
	NT TRANSPARENCY	
9. PAYMEN 92	NT TRANSPARENCY Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes

	D 0 F 0 1 F 1 1	
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 of Ukraine "On prevention and counteraction to legalization (laundering) of criminal proceeds and terrorism financing, as well as financing proliferation of weapons of mass destruction" (No 361-IX dd. 06.12.2019)
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section	v.
	are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC	TIONS	
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 foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other	
	controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Automated
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	ABS Sirius, vendor Lime Systems
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)	1-2 years
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Automated
105	Does the Entity have a data quality management	
	programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions	Used for screening customers and beneficial owners and for filtering transactional data
	List (UN)	Poses for solvening customers and beneficial owners and for intering transactional data

4001	Heiterd Obeter Department (1) To 1 Off	
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Not used
106 f	Other (specify)	Ukraine
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.	Q106e.The Bank is guided in its activities by risk-oriented approach and obligatory compliance with the Legislation of Ukraine. The lists of sanctions can be supplemented in case of relevance.
11. TRAINII	NG & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	illiancing and sanctions violations	
ma	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 a	New issues that occur in the market, e.g. significant	
	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture	Yes Yes
111 e 111 f	New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud	Yes Yes
111 e 111 f 112	New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to:	Yes Yes Yes
111 e 111 f 112 112 a	New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management	Yes Yes Yes Yes Yes
111 e 111 f 112 112 a 112 b	New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence	Yes Yes Yes Yes Yes Yes Yes
111 e 111 f 112 112 a 112 b 112 c	New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence	Yes Yes Yes Yes Yes Yes Yes Yes Yes
111 e 111 f 112 112 a 112 b 112 c 112 d 112 e	New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence Third parties to which specific FCC activities have been	Yes
111 e 111 f 112 112 a 112 b 112 c 112 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced	Yes
111 e 111 f 112 112 a 112 b 112 c 112 c 112 d 112 e	New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high	Yes
111 e 111 f 112 a 112 b 112 c 112 d 112 e	New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced 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	Yes

115 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to	OAAO
	the answers in this section.	Q112e: refers to the activities described in Q29.
		Q112f: The Bank does not have contractors / consultants performing the full range of EDD, so no training is
		provided.
12 OHALITY	ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality	
117	Assurance programme for financial crime (separate from	Yes
	the independent Audit function)?	
118	Does the Entity have a program wide risk based	
110	Compliance Testing process (separate from the	Yes
	independent Audit function)?	
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	<u> </u>	
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, Fraud	Yes
	and Sanctions policies and practices on a regular basis?	
	and canonic pension and practices on a regular basis.	
122	How often is the Entity audited on its AML, CTF, ABC,	
	Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Not Applicable
123	Does the internal audit function or other independent third	Not Applicable
123	party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and	
120 u	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
123 j	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123 K	Other (specify)	· · · · · · · · · · · · · · · · · · ·
1201	Caror (apoony)	
-		
124	Are adverse findings from internal & external audit tracked	
	to completion and assessed for adequacy and	Yes
	completeness?	
125	Confirm that all responses provided in the above section	Yes
	are representative of all the LE's branches	1.00
125 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to	
	the answers in this section.	Associated to the continuous of the Hillstein booking to the Continuous of the Conti
		According to the requirements of the Ukrainian banking law the results of the internal audit of AML must be
		submitted to the National bank of Ukraine within 10 working days after the discussion with the Supervisory Board.
14. FRAUD		
127	Does the Entity have policies in place addressing fraud	V
	risk?	Yes
128	Does the Entity have a dedicated team responsible for	Yes
	preventing & detecting fraud?	169

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

JSC "FUIB" (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 belta accounts.

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

The Financial Institution recognises the importance of transparency regarding parties to transactions in integrational 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 Banking 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 months.

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

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

I, HANNA Horbenko (MLRO or equivalent), certify that thave 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.

(Signature & Date)

SAHKS

(Signature & Date)

1