



Financial Institution Name:

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Location (Country) :

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

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

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

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

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

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

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



Financial Institution Name:

Location (Country) :

The questionnaire is required to be answered on a Legal Entity (LE) Level. This means the Financial Institution will answer the questionnaire at an ultimate parent / head office & subsidiary level for which any branches would be considered covered by that parent/subsidiary DDQ. This questionnaire should not cover more than one LE. Each question in the DDQ 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 differed for one of its branches this needs to be highlighted and detail regarding this difference captured at the end of each subsection. If a branch business activity (products offered, client base etc.) is significantly different than its head office, the branch should complete a separate questionnaire.

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



11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	
12	Jurisdiction of licensing authority and regulator of ultimate parent	
13	Select the business areas applicable to the Entity	
13 a	Retail Banking	
13 b	Private Banking / Wealth Management	
13 c	Commercial Banking	
13 d	Transactional Banking	
13 e	Investment Banking	
13 f	Financial Markets Trading	
13 g	Securities Services/ Custody	
13 h	Broker/Dealer	
13 i	Multilateral Development Bank	
13 j	Other	
14	Does the Entity have a significant (10% or more) offshore customer base, either by number of customers or by revenues (where off-shore means not domiciled in the jurisdiction where bank services are being provided) ?	
14 a	If Y, provide details of the country and %	
15	Select the closest value:	
15 a	Number of employees	
15 b	Total Assets	
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
16 b	If appropriate, provide any additional information / context to the answers in this section.	

<b>2. PRODUCTS &amp; SERVICES</b>		
<b>17</b>	Does the Entity offer the following products and services:	
<b>17 a</b>	Correspondent Banking	
<b>17 a1</b>	If Y	
<b>17 a2</b>	Does the Entity offer Correspondent Banking services to domestic banks?	
<b>17 a3</b>	Does the Entity allow domestic bank clients to provide downstream relationships?	
<b>17 a4</b>	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	
<b>17 a5</b>	Does the Entity offer correspondent banking services to Foreign Banks?	
<b>17 a6</b>	Does the Entity allow downstream relationships with Foreign Banks?	
<b>17 a7</b>	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	
<b>17 a8</b>	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	
<b>17 a9</b>	Does the Entity allow downstream relationships with MSBs/MVTS?	
<b>17 a10</b>	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?	
<b>17 b</b>	Private Banking (domestic & international)	
<b>17 c</b>	Trade Finance	
<b>17 d</b>	Payable Through Accounts	
<b>17 e</b>	Stored Value Instruments	
<b>17 f</b>	Cross Border Bulk Cash Delivery	
<b>17 g</b>	Domestic Bulk Cash Delivery	
<b>17 h</b>	International Cash Letter	
<b>17 i</b>	Remote Deposit Capture	
<b>17 j</b>	Virtual /Digital Currencies	
<b>17 k</b>	Low Price Securities	
<b>17 l</b>	Hold Mail	
<b>17 m</b>	Cross Border Remittances	
<b>17 n</b>	Service to walk-in customers (non-account holders)	
<b>17 o</b>	Sponsoring Private ATMs	
<b>17 p</b>	Other high risk products and services identified by the Entity	
<b>18</b>	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	
<b>18 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
<b>18 b</b>	If appropriate, provide any additional information / context to the answers in this section.	

<b>3. AML, CTF &amp; SANCTIONS PROGRAMME</b>		
<b>19</b>	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
<b>19 a</b>	Appointed Officer with sufficient experience/expertise	
<b>19 b</b>	Cash Reporting	
<b>19 c</b>	CDD	
<b>19 d</b>	EDD	
<b>19 e</b>	Beneficial Ownership	
<b>19 f</b>	Independent Testing	
<b>19 g</b>	Periodic Review	
<b>19 h</b>	Policies and Procedures	
<b>19 i</b>	Risk Assessment	
<b>19 j</b>	Sanctions	
<b>19 k</b>	PEP Screening	
<b>19 l</b>	Adverse Information Screening	
<b>19 m</b>	Suspicious Activity Reporting	
<b>19 n</b>	Training and Education	
<b>19 o</b>	Transaction Monitoring	
<b>20</b>	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	
<b>21</b>	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	
<b>22</b>	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	
<b>23</b>	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	
<b>23 a</b>	If Y, provide further details	
<b>24</b>	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are Representative of all the LE's branches	
<b>24 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
<b>24 b</b>	If appropriate, provide any additional information / context to the answers in this section.	

<b>4. ANTI BRIBERY &amp; CORRUPTION</b>		
25	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	
26	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	
27	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	
28	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	
29	Is the Entity's ABC programme applicable to:	
29 a	Joint ventures	
29 b	Third parties acting on behalf of the Entity	
30	Does the Entity have a global ABC policy that:	
30 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage	
30 b	Includes enhanced requirements regarding interaction with public officials?	
30 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)?	
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	
32	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	
33	Does the Entity perform an Enterprise Wide ABC risk assessment?	
33 a	If Y select the frequency	
34	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	

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35	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
35 a	Potential liability created by intermediaries and other third-party providers as appropriate	
35 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	
35 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	
35 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	
35 e	Changes in business activities that may materially increase the Entity's corruption risk	
36	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	
37	Does the Entity provide mandatory ABC training to:	
37 a	Board and Senior Committee Management	
37 b	1st Line of Defence	
37 c	2nd Line of Defence	
37 d	3rd Line of Defence	
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	
37 f	Non-employed workers as appropriate (contractors/consultants)	
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
39 b	If appropriate, provide any additional information / context to the answers in this section.	

<b>5. POLICIES &amp; PROCEDURES</b>		
<b>40</b>	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
<b>40 a</b>	Money laundering	
<b>40 b</b>	Terrorist financing	
<b>40 c</b>	Sanctions violations	
<b>41</b>	Are the Entity's policies and procedures updated at least annually?	
<b>42</b>	Are the Entity's policies and procedures gapped against/compared to:	
<b>42 a</b>	US Standards	
<b>42 a1</b>	If Y, does the Entity retain a record of the results?	
<b>42 b</b>	EU Standards	
<b>42 b1</b>	If Y, does the Entity retain a record of the results?	
<b>43</b>	Does the Entity have policies and procedures that:	
<b>43 a</b>	Prohibit the opening and keeping of anonymous and fictitious named accounts	
<b>43 b</b>	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	
<b>43 c</b>	Prohibit dealing with other entities that provide banking services to unlicensed banks	
<b>43 d</b>	Prohibit accounts/relationships with shell banks	
<b>43 e</b>	Prohibit dealing with another entity that provides services to shell banks	
<b>43 f</b>	Prohibit opening and keeping of accounts for Section 311 designated entities	
<b>43 g</b>	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	
<b>43 h</b>	Assess the risks of relationships with PEPs, including their family and close associates	
<b>43 i</b>	Define escalation processes for financial crime risk issues	
<b>43 j</b>	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	
<b>43 k</b>	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	
<b>43 l</b>	Outline the processes regarding screening for sanctions, PEPs and negative media	
<b>43 m</b>	Outline the processes for the maintenance of internal "watchlists"	
<b>44</b>	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	
<b>45</b>	Does the Entity have a record retention procedures that comply with applicable laws?	
<b>45 a</b>	If Y, what is the retention period?	
<b>46</b>	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	
<b>46 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
<b>46 b</b>	If appropriate, provide any additional information / context to the answers in this section.	

<b>6. AML, CTF &amp; SANCTIONS RISK ASSESSMENT</b>		
47	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
47 a	Client	
47 b	Product	
47 c	Channel	
47 d	Geography	
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	
48 b	Customer Due Diligence	
48 c	PEP Identification	
48 d	Transaction Screening	
48 e	Name Screening against Adverse Media & Negative News	
48 f	Training and Education	
48 g	Governance	
48 h	Management Information	
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	
50 b	Product	
50 c	Channel	
50 d	Geography	
51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
51 a	Customer Due Diligence	
51 b	Transaction Screening	
51 c	Name Screening	
51 d	List Management	
51 e	Training and Education	
51 f	Governance	
51 g	Management Information	
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	
52 a	If N, provide the date when the last Sanctions EWRA was completed.	
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53 b	If appropriate, provide any additional information / context to the answers in this section.	

<b>7. KYC, CDD and EDD</b>		
<b>54</b>	Does the Entity verify the identity of the customer?	
<b>55</b>	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days	
<b>56</b>	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
<b>56 a</b>	Ownership structure	
<b>56 b</b>	Customer identification	
<b>56 c</b>	Expected activity	
<b>56 d</b>	Nature of business/employment	
<b>56 e</b>	Product usage	
<b>56 f</b>	Purpose and nature of relationship	
<b>56 g</b>	Source of funds	
<b>56 h</b>	Source of wealth	
<b>57</b>	Are each of the following identified:	
<b>57 a</b>	Ultimate beneficial ownership	
<b>57 a1</b>	Are ultimate beneficial owners verified?	
<b>57 b</b>	Authorised signatories (where applicable)	
<b>57 c</b>	Key controllers	
<b>57 d</b>	Other relevant parties	
<b>58</b>	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification ?	
<b>59</b>	Does the due diligence process result in customers receiving a risk classification?	
<b>60</b>	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
<b>60 a</b>	Product Usage	
<b>60 b</b>	Geography	
<b>60 c</b>	Business Type/Industry	
<b>60 d</b>	Legal Entity type	
<b>60 e</b>	Adverse Information	
<b>60 f</b>	Other (specify)	



61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	
62	If Y, is this at:	
62 a	Onboarding	
62 b	KYC renewal	
62 c	Trigger event	
63	What is the method used by the Entity to screen for adverse media / negative news?	
63 a	Automated	
63 b	Manual	
63 c	Combination of automated and manual	
64	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
65	If Y, is this at:	
65 a	Onboarding	
65 b	KYC renewal	
65 c	Trigger event	
66	What is the method used by the Entity to screen PEPs?	
66 a	Automated	
66 b	Manual	
66 c	Combination of automated and manual	
67	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?	
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	
68 b	Trigger event	
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	

<b>70</b>	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?	
<b>70 a</b>	Non-account customers	
<b>70 b</b>	Offshore customers	
<b>70 c</b>	Shell banks	
<b>70 d</b>	MVTS/ MSB customers	
<b>70 e</b>	PEPs	
<b>70 f</b>	PEP Related	
<b>70 g</b>	PEP Close Associate	
<b>70 h</b>	Correspondent Banks	
<b>70 h1</b>	If EDD or EDD & Restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	
<b>70 i</b>	Arms, defense, military	
<b>70 j</b>	Atomic power	
<b>70 k</b>	Extractive industries	
<b>70 l</b>	Precious metals and stones	
<b>70 m</b>	Unregulated charities	
<b>70 n</b>	Regulated charities	
<b>70 o</b>	Red light business / Adult entertainment	
<b>70 p</b>	Non-Government Organisations	
<b>70 q</b>	Virtual currencies	
<b>70 r</b>	Marijuana	
<b>70 s</b>	Embassies/Consulates	
<b>70 t</b>	Gambling	
<b>70 u</b>	Payment Service Provider	
<b>70 v</b>	Other (specify)	
<b>71</b>	If restricted, provide details of the restriction	
<b>72</b>	Does the Entity perform an additional control or quality review on clients subject to EDD?	
<b>73</b>	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	
<b>73 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
<b>73 b</b>	If appropriate, provide any additional information / context to the answers in this section.	

<b>8. MONITORING &amp; REPORTING</b>		
74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	
75	What is the method used by the Entity to monitor transactions for suspicious activities?	
75 a	Automated	
75 b	Manual	
75 c	Combination of automated and manual	
76	If manual or combination selected, specify what type of transactions are monitored manually	
77	Does the Entity have regulatory requirements to report currency transactions?	
77 a	If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements?	
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
79 b	If appropriate, provide any additional information / context to the answers in this section.	
<b>9. PAYMENT TRANSPARENCY</b>		
80	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	
81	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
81 a	FATF Recommendation 16	
81 b	Local Regulations	
81 b1	Specify the regulation	
81 c	If N, explain	
82	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	
83	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	

84	Does the Entity have controls to support the inclusion of required beneficiary in international payment messages?	
85	Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	
85 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
85 b	If appropriate, provide any additional information / context to the answers in this section.	
<b>10. SANCTIONS</b>		
86	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions?	
87	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)?	
88	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?	
89	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	
90	What is the method used by the Entity?	
90 a	Manual	
90 b	Automated	
90 c	Combination of Automated and Manual	
91	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	
92	What is the method used by the Entity?	
92 a	Manual	
92 b	Automated	
92 c	Combination Automated and Manual	
93	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
93 a	Consolidated United Nations Security Council Sanctions List (UN)	
93 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	
93 c	Office of Financial Sanctions Implementation HMT (OFSI)	
93 d	European Union Consolidated List (EU)	
93 e	Lists maintained by other G7 member countries	

93 f	Other (specify)	
94	When new entities and natural persons are added to sanctions lists, how many business days before the Entity updates its lists?	
95	When updates or additions to the Sanctions Lists are made, how many business days before the Entity updates their active manual and / or automated screening system against:	
95 a	Customer Data	
95 b	Transactions	
96	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	
<b>11. TRAINING &amp; EDUCATION</b>		
98	Does the Entity provide mandatory training, which includes :	
98 a	Identification and reporting of transactions to government authorities	
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	
98 e	Conduct and Culture	
99	Is the above mandatory training provided to :	
99 a	Board and Senior Committee Management	
99 b	1st Line of Defence	
99 c	2nd Line of Defence	
99 d	3rd Line of Defence	
99 e	3rd parties to which specific FCC activities have been outsourced	
99 f	Non-employed workers (contractors/consultants)	
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	

101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
102 b	If appropriate, provide any additional information / context to the answers in this section.	
<b>12. QUALITY ASSURANCE /COMPLIANCE TESTING</b>		
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
105 b	If appropriate, provide any additional information / context to the answers in this section.	
<b>13. AUDIT</b>		
106	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF and Sanctions policies and practices on a regular basis?	
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:	
107 a	Internal Audit Department	
107 b	External Third Party	

<b>108</b>	Does the internal audit function or other independent third party cover the following areas:	
<b>108 a</b>	AML, CTF & Sanctions policy and procedures	
<b>108 b</b>	KYC / CDD / EDD and underlying methodologies	
<b>108 c</b>	Transaction Monitoring	
<b>108 d</b>	Transaction Screening including for sanctions	
<b>108 e</b>	Name Screening & List Management	
<b>108 f</b>	Training & Education	
<b>108 g</b>	Technology	
<b>108 h</b>	Governance	
<b>108 i</b>	Reporting/Metrics & Management Information	
<b>108 j</b>	Suspicious Activity Filing	
<b>108 k</b>	Enterprise Wide Risk Assessment	
<b>108 l</b>	Other (specify)	
<b>109</b>	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	
<b>110</b>	Confirm that all responses provided in the above Section, AUDIT are representative of all the LE's branches	
<b>110 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
<b>110 b</b>	If appropriate, provide any additional information / context to the answers in this section.	

**Declaration Statement**

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2018 (CBDDQ V1.2)

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)

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

\_\_\_\_\_ (Bank name) 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.

\_\_\_\_\_ (Bank name) recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

\_\_\_\_\_ (Bank name) 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 on an annual basis.

\_\_\_\_\_ (Bank name) commits to file accurate supplemental information on a timely basis.

I, \_\_\_\_\_ (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of \_\_\_\_\_ (Bank name)

I, \_\_\_\_\_ (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of \_\_\_\_\_ (Bank name)

\_\_\_\_\_ (Signature & Date (DD/MM/YYYY))

\_\_\_\_\_ (Signature & Date (DD/MM/YYYY))