



Financial Institution Name:

EXIM CREDIT LLC

Location (Country) :

DUBAI, UNITED ARAB EMIRATES

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	EXIM CREDIT LLC
2	Append a list of branches which are covered by this questionnaire	Not Applicable
3	Full Legal (Registered) Address	DUBAI MUNICIPALITY BUILDING RM. NO. M01, MURAUQABAT, DEIRA DUBAI UNITED ARAB EMIRATES
4	Full Primary Business Address (if different from above)	Not Applicable
5	Date of Entity incorporation/ establishment	25-Jul-19
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker symbol	Not Applicable
6 b	Member Owned/ Mutual	Yes
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	51% AMNA MOHD SALMAN BASHEER / 49% RUSANA GOSEPH WARYOBA
7	% of the Entity's total shares composed of bearer shares	300 SHARES IN CASH, THE VALUE OF EACH SHARE BEING DIRHAMS 1000
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	No
a	If Y, provide the name of the relevant branch/es which operate under an OBL	Not Applicable
9	Name of primary financial regulator / supervisory authority	DFSA / DIFC
10	Provide Legal Entity Identifier (LEI) if available	Not Applicable

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11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	Not Applicable
12	Jurisdiction of licensing authority and regulator of ultimate parent	Not Applicable
13	Select the business areas applicable to the Entity	
13 a	Retail Banking	No
13 b	Private Banking / Wealth Management	Yes
13 c	Commercial Banking	Yes
13 d	Transactional Banking	Yes
13 e	Investment Banking	Yes
13 f	Financial Markets Trading	Yes
13 g	Securities Services / Custody	No
13 h	Broker / Dealer	Yes
13 i	Multilateral Development Bank	No
13 j	Other	Not Applicable
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) ?	No
14 a	If Y, provide details of the country and %	Not Applicable
15	Select the closest value:	
15 a	Number of employees	1-50
15 b	Total Assets	Less than \$10 million
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	Yes
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
16 b	If appropriate, provide any additional information / context to the answers in this section.	Not Applicable

<b>2. PRODUCTS &amp; SERVICES</b>		
<b>17</b>	Does the Entity offer the following products and services:	
<b>17 a</b>	Correspondent Banking	Yes
<b>17 a1</b>	If Y	
<b>17 a2</b>	Does the Entity offer Correspondent Banking services to domestic banks?	Yes
<b>17 a3</b>	Does the Entity allow domestic bank clients to provide downstream relationships?	Yes
<b>17 a4</b>	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes
<b>17 a5</b>	Does the Entity offer correspondent banking services to Foreign Banks?	Yes
<b>17 a6</b>	Does the Entity allow downstream relationships with Foreign Banks?	Yes
<b>17 a7</b>	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	Yes
<b>17 a8</b>	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	No
<b>17 a9</b>	Does the Entity allow downstream relationships with MSBs/MVTS?	No
<b>17 a10</b>	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?	No
<b>17 b</b>	Private Banking (domestic & international)	Yes
<b>17 c</b>	Trade Finance	Yes
<b>17 d</b>	Payable Through Accounts	Yes
<b>17 e</b>	Stored Value Instruments	Yes
<b>17 f</b>	Cross Border Bulk Cash Delivery	Yes
<b>17 g</b>	Domestic Bulk Cash Delivery	No
<b>17 h</b>	International Cash Letter	Yes
<b>17 i</b>	Remote Deposit Capture	No
<b>17 j</b>	Virtual /Digital Currencies	Yes
<b>17 k</b>	Low Price Securities	No
<b>17 l</b>	Hold Mail	Yes
<b>17 m</b>	Cross Border Remittances	Yes
<b>17 n</b>	Service to walk-in customers (non-account holders)	Yes
<b>17 o</b>	Sponsoring Private ATMs	No
<b>17 p</b>	Other high risk products and services identified by the Entity	Not Applicable
<b>18</b>	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	Yes
<b>18 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
<b>18 b</b>	If appropriate, provide any additional information / context to the answers in this section.	Not Applicable

<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	Yes
<b>19 b</b>	Cash Reporting	Not Applicable
<b>19 c</b>	CDD	Yes
<b>19 d</b>	EDD	Yes
<b>19 e</b>	Beneficial Ownership	No
<b>19 f</b>	Independent Testing	No
<b>19 g</b>	Periodic Review	No
<b>19 h</b>	Policies and Procedures	Yes
<b>19 i</b>	Risk Assessment	Yes
<b>19 j</b>	Sanctions	No
<b>19 k</b>	PEP Screening	Yes
<b>19 l</b>	Adverse Information Screening	Yes
<b>19 m</b>	Suspicious Activity Reporting	Yes
<b>19 n</b>	Training and Education	Yes
<b>19 o</b>	Transaction Monitoring	Yes
<b>20</b>	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	Less than 10
<b>21</b>	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	No
<b>22</b>	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	Yes
<b>23</b>	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
<b>23 a</b>	If Y, provide further details	N/A
<b>24</b>	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	Yes
<b>24 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
<b>24 b</b>	If appropriate, provide any additional information / context to the answers in this section.	N/A

<b>4. ANTI BRIBERY &amp; CORRUPTION</b>		
<b>25</b>	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	Yes
<b>26</b>	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
<b>27</b>	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
<b>28</b>	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
<b>29</b>	Is the Entity's ABC programme applicable to:	
<b>29 a</b>	Joint ventures	Yes
<b>29 b</b>	Third parties acting on behalf of the Entity	Yes
<b>30</b>	Does the Entity have a global ABC policy that:	
<b>30 a</b>	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	No
<b>30 b</b>	Includes enhanced requirements regarding interaction with public officials?	Yes
<b>30 c</b>	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
<b>31</b>	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
<b>32</b>	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	Yes
<b>33</b>	Does the Entity perform an Enterprise Wide ABC risk assessment?	Yes
<b>33 a</b>	If Y select the frequency	12 Months
<b>34</b>	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes

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<b>35</b>	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
<b>35 a</b>	Potential liability created by intermediaries and other third-party providers as appropriate	Yes
<b>35 b</b>	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
<b>35 c</b>	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	No
<b>35 d</b>	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
<b>35 e</b>	Changes in business activities that may materially increase the Entity's corruption risk	No
<b>36</b>	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
<b>37</b>	Does the Entity provide mandatory ABC training to:	
<b>37 a</b>	Board and senior Committee Management	Yes
<b>37 b</b>	1st Line of Defence	Yes
<b>37 c</b>	2nd Line of Defence	Yes
<b>37 d</b>	3rd Line of Defence	No
<b>37 e</b>	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
<b>37 f</b>	Non-employed workers as appropriate (contractors/consultants)	Not Applicable
<b>38</b>	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
<b>39</b>	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	Yes
<b>39 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
<b>39 b</b>	If appropriate, provide any additional information / context to the answers in this section.	Not Applicable

5. POLICIES & PROCEDURES		
40	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
40 a	Money laundering	Yes
40 b	Terrorist financing	Yes
40 c	Sanctions violations	Yes
41	Are the Entity's policies and procedures updated at least annually?	Yes
42	Are the Entity's policies and procedures gapped against/compared to:	
42 a	US Standards	No
42 a1	If Y, does the Entity retain a record of the results?	Not Applicable
42 b	EU Standards	No
42 b1	If Y, does the Entity retain a record of the results?	Not Applicable
43	Does the Entity have policies and procedures that:	
43 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
43 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
43 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
43 d	Prohibit accounts/relationships with shell banks	Yes
43 e	Prohibit dealing with another entity that provides services to shell banks	Yes
43 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
43 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	Yes
43 h	Assess the risks of relationships with PEPs, including their family and close associates	Yes
43 i	Define escalation processes for financial crime risk issues	Yes
43 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
43 k	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Yes
43 l	Outline the processes regarding screening for sanctions, PEPs and negative media	Yes
43 m	Outline the processes for the maintenance of internal "watchlists"	Yes
44	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
45	Does the Entity have a record retention procedures that comply with applicable laws?	No
45 a	If Y, what is the retention period?	Less than 5 years
46	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	No
46 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
46 b	If appropriate, provide any additional information / context to the answers in this section.	Not Applicable

<b>6. AML, CTF &amp; SANCTIONS RISK ASSESSMENT</b>		
<b>47</b>	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
<b>47 a</b>	Client	Yes
<b>47 b</b>	Product	Yes
<b>47 c</b>	Channel	No
<b>47 d</b>	Geography	No
<b>48</b>	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
<b>48 a</b>	Transaction Monitoring	Yes
<b>48 b</b>	Customer Due Diligence	Yes
<b>48 c</b>	PEP Identification	Yes
<b>48 d</b>	Transaction Screening	Yes
<b>48 e</b>	Name Screening against Adverse Media & Negative News	No
<b>48 f</b>	Training and Education	Yes
<b>48 g</b>	Governance	Yes
<b>48 h</b>	Management Information	Yes
<b>49</b>	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
<b>49 a</b>	If N, provide the date when the last AML & CTF EWRA was completed.	Not Applicable
<b>50</b>	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
<b>50 a</b>	Client	Yes
<b>50 b</b>	Product	Yes
<b>50 c</b>	Channel	Yes
<b>50 d</b>	Geography	No
<b>51</b>	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
<b>51 a</b>	Customer Due Diligence	Yes
<b>51 b</b>	Transaction Screening	Yes
<b>51 c</b>	Name Screening	Yes
<b>51 d</b>	List Management	Yes
<b>51 e</b>	Training and Education	Yes
<b>51 f</b>	Governance	Yes
<b>51 g</b>	Management Information	Yes
<b>52</b>	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
<b>52 a</b>	If N, provide the date when the last Sanctions EWRA was completed.	Not Applicable
<b>53</b>	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	Yes
<b>53 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
<b>53 b</b>	If appropriate, provide any additional information / context to the answers in this section.	Not Applicable



7. KYC, CDD and EDD		
54	Does the Entity verify the identity of the customer?	Yes
55	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	Yes
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	Yes
56 b	Customer identification	Yes
56 c	Expected activity	Yes
56 d	Nature of business/employment	Yes
56 e	Product usage	Yes
56 f	Purpose and nature of relationship	Yes
56 g	Source of funds	Yes
56 h	Source of wealth	Yes
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	Yes
57 a1	Are ultimate beneficial owners verified?	Yes
57 b	Authorised signatories (where applicable)	Yes
57 c	Key controllers	Yes
57 d	Other relevant parties	Not Applicable
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification ?	10%
59	Does the due diligence process result in customers receiving a risk classification?	No
60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60 a	Product Usage	Yes
60 b	Geography	Yes
60 c	Business Type/Industry	Yes
60 d	Legal Entity type	Yes
60 e	Adverse Information	Yes
60 f	Other (specify)	Not Applicable

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61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	No
62	If Y, is this at:	
62 a	Onboarding	Yes
62 b	KYC renewal	Yes
62 c	Trigger event	No
63	What is the method used by the Entity to screen for adverse media / negative news?	
63 a	Automated	No
63 b	Manual	Yes
63 c	Combination of automated and manual	Yes
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?	No
65	If Y, is this at:	
65 a	Onboarding	Yes
65 b	KYC renewal	Yes
65 c	Trigger event	Yes
66	What is the method used by the Entity to screen PEPs?	
66 a	Automated	No
66 b	Manual	Yes
66 c	Combination of automated and manual	Yes
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?	Yes
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	Yes
68 b	Trigger event	No
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	No

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

<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?	Yes
75	What is the method used by the Entity to monitor transactions for suspicious activities?	
75 a	Automated	No
75 b	Manual	Yes
75 c	Combination of automated and manual	Yes
76	If manual or combination selected, specify what type of transactions are monitored manually	Not Applicable
77	Does the Entity have regulatory requirements to report currency transactions?	Yes
77 a	If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements?	No
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	Yes
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	Not Applicable
79 b	If appropriate, provide any additional information / context to the answers in this section.	Not Applicable
<b>9. PAYMENT TRANSPARENCY</b>		
80	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
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	Yes
81 b	Local Regulations	Yes
81 b1	Specify the regulation	Not Applicable
81 c	If N, explain	Not Applicable
82	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
83	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	Yes

84	Does the Entity have controls to support the inclusion of required beneficiary in international payment messages?	Yes
85	Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	Yes
85 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
85 b	If appropriate, provide any additional information / context to the answers in this section.	Not Applicable
<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?	Yes
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)?	Yes
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?	No
89	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	No
90	What is the method used by the Entity?	
90 a	Manual	Yes
90 b	Automated	No
90 c	Combination of Automated and Manual	Yes
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	Yes
92 b	Automated	No
92 c	Combination of Automated and Manual	Yes
93	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
93 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners (i.e. reference data)
93 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for filtering transactional data (MT fields)
93 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
93 d	European Union Consolidated List (EU)	Used for filtering transactional data (MT fields)
93 e	Lists maintained by other G7 member countries	Used for filtering transactional data (MT fields)

93 f	Other (specify)	
		Not Applicable
94	When new entities and natural persons are added to sanctions lists, how many business days before the Entity updates its lists?	After 6 or more days
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 systems against:	
95 a	Customer Data	Not Applicable
95 b	Transactions	Not Applicable
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?	No
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	Yes
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
97 b	If appropriate, provide any additional information / context to the answers in this section.	Not Applicable
<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	Yes
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
98 e	Conduct and Culture	Yes
99	Is the above mandatory training provided to :	
99 a	Board and Senior Committee Management	Yes
99 b	1st Line of Defence	Yes
99 c	2nd Line of Defence	Yes
99 d	3rd Line of Defence	No
99 e	3rd parties to which specific FCC activities have been outsourced	Not Applicable
99 f	Non-employed workers (contractors/consultants)	Not Applicable
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	No

101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	Yes
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
102 b	If appropriate, provide any additional information / context to the answers in this section.	Not Applicable
<b>12. QUALITY ASSURANCE /COMPLIANCE TESTING</b>		
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	Yes
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	Yes
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	Yes
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
105 b	If appropriate, provide any additional information / context to the answers in this section.	Not Applicable
<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?	Yes
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:	
107 a	Internal Audit Department	Yearly
107 b	External Third Party	Yearly

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<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	No
<b>108 b</b>	KYC / CDD / EDD and underlying methodologies	Yes
<b>108 c</b>	Transaction Monitoring	Yes
<b>108 d</b>	Transaction Screening including for sanctions	No
<b>108 e</b>	Name Screening & List Management	Yes
<b>108 f</b>	Training & Education	Yes
<b>108 g</b>	Technology	Yes
<b>108 h</b>	Governance	Yes
<b>108 i</b>	Reporting/Metrics & Management Information	No
<b>108 j</b>	Suspicious Activity Filing	Yes
<b>108 k</b>	Enterprise Wide Risk Assessment	Yes
<b>108 l</b>	Other (specify)	Not Applicable
<b>109</b>	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
<b>110</b>	Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches	Yes
<b>110 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
<b>110 b</b>	If appropriate, provide any additional information / context to the answers in this section.	Not Applicable



**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) )