## the Wolfsberg Grou

Financial Institution Name: Location (Country):

DZ PRIVATBANK S.A.	
Luxemburg	

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
THE PROPERTY OF THE	& OWNERSHIP	Allow
1. ENTITY	Full Legal Name	
	Pull Legal Name	DZ PRIVATBANK S.A.
2	Append a list of foreign branches which are covered by this questionnaire	DZ PRIVATBANK S.A., Niederlassung Berlin; Niederlassung Frankfurt a. M.; Niederlassung Düsseldorf; Niederlassung Hannover; Niederlassung Hamburg; Niederlassung Nürnberg; Niederlassung München; Niederlassung Stuttgart
3	Full Legal (Registered) Address	4, rue Thomas Edison L - 1445 Strassen Luxembourg
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	28. December 1977
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	
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	DZ BANK AG
7	% of the Entity's total shares composed of bearer shares	0 %
8	Does the Entity, or any of its branches, operate under an 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 services only through online channels?	No
10	Name of primary financial regulator/supervisory authority	CSSF
11	Provide Legal Entity Identifier (LEI) if available	SVY0KHTJZBP60K295346
	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	DZ BANK AG

Ultradiction of Idensiting authority and regulator of ultradic paperint ultradic paperint ultradiction paperin	ultimate parent  44 Select the business areas applicable to the Entity  45 Protein Banking  46 Commercial Banking  47 No  46 No  46 No  46 No  46 Commercial Banking  48 No  49 No  46 Commercial Banking  49 No  40 No  41 Protein Selected Studies Trading  40 No  41 No  41 No  41 No  42 No  44 No  44 No  44 No  45 No  46 No  46 No  46 No  46 No  47 No  46 No  47 No  48 No  48 No  49 No  40 No  40 No  40 No  40 No  40 No  41 No  40 No		Jurisdiction of licensing authority and regulator of	
Select the business areas applicable to the Entity	Select the business areas applicable to the Entity   No	14	ultimate parent	Germany - BaFin
14	Facility   Processing   Proce	44	dumate parent	
14	Facility   Processing   Proce	4.4		
14	Facility   Processing   Proce	4.4		
14	Feb.   Private Banking   Yes			
14 d. Commercial Banking Yes 14 d. Investment Banking Yes 14 d. Investment Banking Yes 14 f. Investment Banking Yes 14 f. Investment Banking Yes 14 g. Socurifies Services/Custody Yes 14 g. Socurifies Services/Custody Yes 14 h. Bridenial Markes Trading 14 h. Residen Development Bank No 15 l. Western Markes Mar	Face   Commercial Stanking   Yes			
14 de Intervement Banking Yes 14 fe Financial Markels Trading Yes 14 fe Financial Markels Trading Yes 14 g. Securities Service/Subtroly Yes 14 h. Broken/Dealer Yes 14 l. Multilateral Development Bank No 14 l. Wealth Management Yes 14 k. Cher (please explain)  15 Oese the Entity have a significant (10% or more) portfolio or finan-realedint customers or does it derive more than 10% of lits revenue for mon realedint customers? (Non-resident means customers primarily resident in a different priediction to the location where bank services are provided)  15 a If // novoide the bot pre countries where the non-resident customers? (Non-resident where the non-resident customers are located.  16 Safect the closest value: 16 a Number of employees 1001-5000 Greater than 1500 Million  17 Confirm that all responses provided in the above Saction are representative of all the LES branches. 17 a If // Carlefy which questions the differences relate to and the Uranchies that this applies to.  18 If appropriate, provide any additional information-bonkext to the answers in this section.  18 If appropriate, provide any additional information-bonkext to the answers in this section.  19 a Ocrespondent banking No.  2. PRODUCTS & SERVICES 19 Obes the Entity offer the following products and services: 19 a Ocrespondent banking No.  19 a 1 If Y 19 art a Does the Entity offer Correspondent Banking services to demand relationships with domestic banks?  19 a 1 Does the Entity offer Correspondent Banking services to foreign banks?  19 art Does the Entity offer Correspondent Banking services to foreign banks?  19 art Does the Entity offer Correspondent Banking services to foreign banks?  19 art at Does the Entity offer Correspondent Banking services to foreign banks?  19 art Does the Entity offer Correspondent Banking services to foreign banks?  19 art Does the Entity offer Correspondent Banking services to foreign banks?  20 Does the Entity offer Correspondent Banking services to foreign banks?	Taransactional Banking			Yes
14   Investment Banking   Yes	14   Financial Martee Trading   Yes			No
14   Financial Markets Trading   Yes	14   Financial Markets Trading	14 d		Yes
14   Securities Services/Custody   Yes	Securition Services/Cusbdy   Yes	14 e	Investment Banking	Yes
14   Millstearal Development Bank   No	14   Militaleral Development Bank   No	14 f	Financial Markets Trading	Yes
14	Multilateral Development Bank   No	14 g	Securities Services/Custody	Yes
14 k   Wealth Management   Yes	14 k	14 h	Broker/Dealer	Yes
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(MSBs)/Money value Transfer Services (MVTSs)?	19 a1h Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	17 a  17 a  18  2. PRODU  19  19 a  19 a1  19 a1b  19 a1c  19 a1d  19 a1d  19 a1e	Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  CTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	No Please select Please select Please select Please select Please select Please select
	with MSBs, MVTSs, or Payment Service Provider (PSPs)?	17 a  17 a  18  2. PRODU  19  19 a  19 a1  19 a1b  19 a1c  19 a1d  19 a1d  19 a1e	Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  CTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	No Please select Please select Please select Please select Please select Please select
	(PSPs)?	17 a  17 a  18  2. PRODU  19  19 a  19 a1  19 a1a  19 a1c  19 a1c  19 a1d  19 a1f	Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  CTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	No Please select Please select Please select Please select Please select Please select
		17 a  17 a  18  2. PRODU  19  19 a  19 a1  19 a1a  19 a1c  19 a1c  19 a1d  19 a1f	Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  CTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity forer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships	No Please select Please select Please select Please select Please select Please select
	AD AND LANDS	17 a  17 a  18  2. PRODU  19  19 a  19 a1  19 a1a  19 a1c  19 a1c  19 a1d  19 a1f	Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  CTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	No Please select Please select Please select Please select Please select Please select
THEOREM I MASSES I MA	[10] Mr., (ARCA (98) (9) (97) (97) (97) (97) (97) (97) (97)	17 a  17 a  18  2. PRODU  19  19 a  19 a1  19 a1b  19 a1c  19 a1d  19 a1d  19 a1f  19 a1g	Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  CTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity for Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	No Please select
1964; AMC 1964; W. (2005) 41 - 42 - 31. (2005) 41 - 42 - 31.	10.000 MM ( 2 0.000 MM )	17 a  17 a  18  2. PRODU  19  19 a  19 a1  19 a1b  19 a1c  19 a1d  19 a1d  19 a1d  19 a1d  19 a1d	Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  CTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity forer Correspondent Banking services to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?  MSBs	No Please select No
19 a1h2 MVTSs No		17 a  17 a  18  2. PRODU  19  19 a  19 a1  19 a1b  19 a1c  19 a1d  19 a1d  19 a1f  19 a1f  19 a1h  19 a1h1  19 a1h2	Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  CTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?  MSBs  MVTSs	No Please select
IVU IVU	19 a1h2 MVTSs No	17 a  17 a  18  2. PRODU  19  19 a  19 a1  19 a1b  19 a1c  19 a1d  19 a1d  19 a1f  19 a1g	Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  CTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity for Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	No Please select
1906), TARICLOPIC PI (1906) (1943). (2006)		17 a  17 a  18  2. PRODU  19  19 a  19 a1  19 a1b  19 a1c  19 a1d  19 a1d  19 a1d  19 a1d  19 a1d	Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  CTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity forer Correspondent Banking services to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?  MSBs	No Please select No
[10] (A)	40 a4b2   DCDc   No.	17 a  17 a  18  2. PRODU  19  19 a  19 a1  19 a1b  19 a1c  19 a1d  19 a1d  19 a1f  19 a1f  19 a1h  19 a1h1  19 a1h2	Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  CTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?  MSBs  MVTSs	No Please select

19 i  19 i1  19 i2  19 i3  19 i4  19 i5  19 j  19 k  19 i  19 m	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?  Cross-Border Bulk Cash Delivery  Cross-Border Remittances  Domestic Bulk Cash Delivery  Hold Mail  International Cash Letter  Low Price Securities  Payable Through Accounts  Payment services to non-bank entities who may then offer third party payment services to their customers?  If Y , please select all that apply below?  Third Party Payment Service Providers  Virtual Asset Service Providers (VASPs)  eCommerce Platforms  Other - Please explain	Yes No Yes No No No No No No Yes No Please select Please select Please select
19 c 19 d 19 e 19 f 19 g 19 h 19 i  19 ii  10 ii  1	Cross-Border Remittances  Domestic Bulk Cash Delivery  Hold Mail  International Cash Letter  Low Price Securities  Payable Through Accounts  Payment services to non-bank entities who may then offer third party payment services to their customers?  If Y , please select all that apply below?  Third Party Payment Service Providers  Virtual Asset Service Providers (VASPs)  eCommerce Platforms	Yes No No No No Yes No No Please select Please select
19 c 19 d 19 e 19 f 19 g 19 h 19 i  19 ii  10 ii  1	Cross-Border Remittances  Domestic Bulk Cash Delivery  Hold Mail  International Cash Letter  Low Price Securities  Payable Through Accounts  Payment services to non-bank entities who may then offer third party payment services to their customers?  If Y , please select all that apply below?  Third Party Payment Service Providers  Virtual Asset Service Providers (VASPs)  eCommerce Platforms	Yes No No No No Yes No No Please select Please select
19 d 19 e 19 f 19 g 19 h 19 i 19 i 19 i 19 i 19 i3 19 i4 19 i5	Domestic Bulk Cash Delivery Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their customers?  If Y , please select all that apply below? Third Party Payment Service Providers Virtual Asset Service Providers (VASPs) eCommerce Platforms	No No No Yes No No Please select Please select
19 e 19 f 19 g 19 h 19 i	Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their customers?  If Y , please select all that apply below? Third Party Payment Service Providers Virtual Asset Service Providers (VASPs) eCommerce Platforms	No No Yes No No Please select Please select
19 f 19 g 19 h 19 i 19 i 19 i 19 i2 19 i3 19 i4 19 i5	International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their customers?  If Y , please select all that apply below? Third Party Payment Service Providers Virtual Asset Service Providers (VASPs) eCommerce Platforms	No Yes No No Please select Please select
19 g 19 h 19 i 19 i 19 i1 19 i2 19 i3 19 i4 19 i5	Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their customers?  If Y , please select all that apply below? Third Party Payment Service Providers Virtual Asset Service Providers (VASPs) eCommerce Platforms	Yes No No Please select Please select
19 h 19 i 19 i1 19 i2 19 i3 19 i4 19 i5  19 j 19 k 19 i 19 m	Payable Through Accounts  Payment services to non-bank entities who may then offer third party payment services to their customers?  If Y , please select all that apply below?  Third Party Payment Service Providers  Virtual Asset Service Providers (VASPs)  eCommerce Platforms	No No Please select Please select
19 i  19 i1  19 i2  19 i3  19 i4  19 i5  19 j  19 k  19 i  19 m	Payment services to non-bank entities who may then offer third party payment services to their customers?  If Y , please select all that apply below? Third Party Payment Service Providers Virtual Asset Service Providers (VASPs) eCommerce Platforms	No Please select Please select
19 i1 19 i2 19 i3 19 i4 19 i5 19 j 19 k 19 l	then offer third party payment services to their customers?  If Y , please select all that apply below? Third Party Payment Service Providers Virtual Asset Service Providers (VASPs) eCommerce Platforms	Please select Please select
19 i2 19 i3 19 i4 19 i5 19 j 19 k 19 l	Third Party Payment Service Providers Virtual Asset Service Providers (VASPs) eCommerce Platforms	Please select
19 i3 19 i4 19 i5 19 j 19 k 19 l 19 m	Virtual Asset Service Providers (VASPs) eCommerce Platforms	Please select
19 i4 19 i5 19 j 19 k 19 l 19 m	eCommerce Platforms	
19 i5 19 j 19 k 19 l 19 m		Please select
19 j 19 k 19 l 19 m	Other - Please explain	
19 k 19 l 19 m		
19 k 19 l 19 m	Private Banking	Both
19 I 19 m	Remote Deposit Capture (RDC)	No
19 m	Sponsoring Private ATMs	No
With the second	Stored Value Instruments	No
	Trade Finance	No
	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:	NO.
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	Please select
19 p2	Wire transfers	No No
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p3	Foreign currency conversion	No No
19 p3a	If yes, state the applicable level of due diligence	Please select
19 p4	Sale of Monetary Instruments	No .
19 p4a	If yes, state the applicable level of due diligence	Please select
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	
	Other high-risk products and services identified by the Entity (please specify)	
	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
15-155 (March 1994)	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	f appropriate, provide any additional nformation/context to the answers in this section.	
3. AML, CTF	& SANCTIONS PROGRAMME	
AI fo	Does the Entity have a programme that sets minimum ML, CTF and Sanctions standards regarding the ollowing components:	
	A DESCRIPTION OF THE PROPERTY AND ADDRESS OF THE PROPERTY OF T	Yes
E_0 19780 - 1978	Adverse Information Screening	Yes
	100 110 100 100 100 100 100 100 100 100	Yes
	Cash Reporting	Yes
22 e	CDD	Yes
22 f	EDD	Yes
22 g	Independent Testing	Yes
2000	Periodic Review	Yes
22 h	Policies and Procedures	Yes
	PEP Screening	
22 i		Yes
22 i !		V
22 i   22 j   22 k	Risk Assessment Sanctions	Yes Yes

22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	1-10
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Yes
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	
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.	,
4. ANTIE	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
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 improperly intended to influence action or obtain an advantage.	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 с	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
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 а	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 risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
40 a	Potential liability created by intermediaries and	Yes

40 b	Corruption risks associated with the countries and 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 officials	Yes
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence  3rd Line of Defence	Yes
42 d 42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Yes Not Applicable
42 f	Non-employed workers as appropriate (contractors/consultants)	Yes
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
5 AMI C	TF & SANCTIONS POLICIES & PROCEDURES	
3. AIVIL, C	Has the Entity documented policies and procedures	
40	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Yes
46 b		
46 c	Terrorist financing	Yes
	Sanctions violations	Yes Yes
47	Sanctions violations  Are the Entity's policies and procedures updated at least annually?	
48	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
47 48 48 a	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
47 48 48 a 48 a1	Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes Yes Yes
47 48 48 a 48 a1 48 b	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
47 48 48 a 48 a1 48 b 48 b1	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
47 48 48 a 48 a1 48 b	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
48 48 a 48 a1 48 b 48 b1 49	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	Yes Yes Yes Yes Yes Yes Yes Yes Yes
48 a 48 a 48 a 1 48 b 48 b 1 49 49 a	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 Yes
48 a 48 a 48 a 1 48 b 48 b 1 49 a 49 b	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	Yes
48 a 48 a 48 a 1 48 b 48 b 1 49 a 49 b 49 c	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
48 a 48 a 1 48 b 48 b 1 49 a 49 b 49 c 49 d	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  Prohibit dealing with another entity that provides	Yes
48 a 48 a 1 48 b 48 b 1 49 a 49 b 49 c 49 d 49 e	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	Yes

49 i 49 j 49 k	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees  Define the process, where appropriate, for	Yes
49 k	terminating existing customer relationships due to financial crime risk	Yes
	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
49 I	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	5 years or more
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context to the answers in this section.	
6 AMI CTE		
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 a	Client	Yes
54 b	Product	Yes
54 c	Channel	Yes
54 d 55	Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes .
55 a	Transaction Monitoring	Yes
55 b	Customer Due Diligence	Yes
55 c	PEP Identification	Yes
55 d	Transaction Screening	Yes
55 e	Name Screening against Adverse Media/Negative News	Yes
55 f	Training and Education	Yes
55 g	Governance	Yes
55 h 56	Management Information  Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
56 a	If N, provide the date when the last AML & CTF EWRA was completed.	
57	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
57 a	Client	Yes
F7 L	Product	Yes
57 b	Channel	Yes
57 c		
57 c 57 d	Geography	Yes
57 c 57 d 58	Geography  Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
57 c 57 d 58 58 a	Geography  Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:  Customer Due Diligence	Yes
57 c 57 d 58	Geography  Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	

	T.,	T
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 last 12 months?	Yes
	Washed Watterface of the South April 1905 and 19	
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context to the answers in this section.	
7 KYC C	DD and EDD	
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 30 days?	Yes
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
64 h	Source of wealth	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?	25%
67	Does the due diligence process result in customers receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	PEP; Wealth
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes
68 a	If Y, is this at:	
68 a1	Onboarding	Please select
68 a2	KYC renewal	Please select
68 a3	Trigger event	Yes
68 a4	Other	Please select
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes
69 a 69 a1	If Y, is this at: Onboarding	Wee
CHARLES SANSII		Yes
69 a2	KYC renewal	Yes

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	163
70	Adverse Media/Negative News?	Automated
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Automated
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	Yes
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews	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 Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	Do not have this category of customer or industry
76 d	Extractive industries	EDD on risk-based approach
76 e	Gambling customers	Always subject to EDD
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
NOTE:	·	
76 h	MSB/MVTS customers	EDD on risk-based approach
76 i	Non-account customers	Do not have this category of customer or industry
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	EDD on risk-based approach
76 I	Nuclear power	Do not have this category of customer or industry
76 m	Payment Service Providers	EDD on risk-based approach
76 n	PEPs	Always subject to EDD
76 o	PEP Close Associates	Always subject to EDD
76 p	PEP Related	Always subject to EDD
76 q	Precious metals and stones	Always subject to EDD
76 r	Red light businesses/Adult entertainment	Do not have this category of customer or industry
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited
25 75 7		
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v	Unregulated charities	EDD on risk-based approach
76 w	Used Car Dealers	Always subject to EDD
76 x	Virtual Asset Service Providers	Do not have this category of customer or industry
76 y	Other (specify)	
77	If restricted, provide details of the restriction	The country of the client, the result of the EDD of the potential client based on the conducted activities, the exact details of the customers-category and so on.
78	Does EDD require senior business management and/ or compliance approval?	Yes

70 2	If V indicate who provides the approved:	Doth
78 a 79	If Y indicate who provides the approval:  Does the Entity have specific procedures for	Both
	onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Yes
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 are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
82	If appropriate, provide any additional information/context to the answers in this section.	
8. MONITO	RING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Automated
84 a	If manual or combination selected, specify what type of transactions are monitored manually	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Vendor-sourced tools
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	ACTICO Compliance Suite
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
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 reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
	Does the Entity have a data quality management 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 Request For Information (RFIs) from other entities in a timely manner?	Yes
	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	
9. PAYMEN	T TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group	Yes
	Payment Transparency Standards?	100

93 a FATF Recommendation 16 95 b Local Regulations 97 If N, explain  Parameter Regulation FATCA Regulation Regulation (EU) 847/2015, Common Reporting Standard, FATCA Regulation, AN Regulation (EU) 847/2015, Common Reporting Standard, FATCA Regulation, AN Regulation (EU) 847/2015, Common Reporting Standard, FATCA Regulation, AN Regulation (EU) 847/2015, Common Reporting Standard, FATCA Regulation, AN Regulation (EU) 847/2015, Common Reporting Standard, FATCA Regulation, AN Pes  98	ML-Law
93 b Local Regulations Yes  Regulation (EU) 847/2015, Common Reporting Standard, FATCA Regulation, AN  Regulation (EU) 847/2015, Common Reporting Standard, FATCA Regulation, AN  Page 1	ML-Law
93 bl If Y, specify the regulation Regulation (EU) 847/2015, Common Reporting Standard, FATCA Regulation, AN  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?  95 Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?  95 a If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?  96 Confirm that all responses provided in the above Section are representative of all the LE's branches  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	ML-Law
Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?  Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?  If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?  Confirm that all responses provided in the above Section are representative of all the LE's branches  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
of required and accurate originator information in cross border payment messages?  Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?  If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?  Confirm that all responses provided in the above Section are representative of all the LE's branches  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
of required beneficiary information cross-border payment messages?  95 a	
beneficiary address including country in cross border payments?  96	
Section are representative of all the LE's branches  96 a  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  97  If appropriate, provide any additional	
and the branch/es that this applies to.  97 If appropriate, provide any additional	
10. SANCTIONS	
98 Does the Entity have a Sanctions Policy approved by	grant to the 25
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?	
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)?	
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?	
Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?  Does the Entity screen its customers, including beneficial ownership information collected by the Yes	
What is the method used by the Entity for sanctions screening?  Both Automated and Manual	
102 a If 'automated' or 'both automated and manual' selected:	
102 a1 Are internal system of vendor-sourced tools used? Vendor-sourced tools	
If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?  ACTICO Compliance Suite	
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)  **Total Complete Test (In the distribution of the submitted in the complete Test (In the complete Test	
Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?  Yes	
104 What is the method used by the Entity? Automated	

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 с	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners (i.e. reference data)
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners (i.e. reference data)
106 f	Other (specify)	
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 а	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	,
110	If appropriate, provide any additional information/context to the answers in this section.	
11 TOAINI	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 с	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
112 f	Non-employed workers (contractors/consultants)	Not applicable
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches	Yes

115 a		
.104	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
440		
116	If appropriate, provide any additional information/context to the answers in this section.	
12. QUALITY	Y ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based	
110	Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
13. AUDIT		
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
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	Yearly
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes
123 b 123 c	Enterprise Wide Risk Assessment Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes Yes
123 e	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k 123 l	Training & Education Other (specify)	Yes
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy	Yes
	and completeness?	
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 125 a	Confirm that all responses provided in the above	Yes
	Confirm that all responses provided in the above section are representative of all the LE's branches  If N, clarify which questions the difference/s relate to	Yes
125 a	Confirm that all responses provided in the above section are representative of all the LE's branches  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.	Yes
125 a	Confirm that all responses provided in the above section are representative of all the LE's branches  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.	Yes

129	Does the Entity have real time monitoring to detect fraud?	Yes		
130	Do lhe Enlity'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)				
DZ PRIVATBANK S.A. (Financial Institution name) is fully committed to the fight against financial crime and makes				
every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.				
The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.				
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.				
The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent 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.				
, Ayhan Güler  (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that he 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 nstitution.				
, _ Christian B	(METO of equit	valent), certify that I have read and understood this declaration, that the answers provided in this		
Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.				
1st August 2024 (Signature & Date)				
	ally	F		
1st August 20	24 (Signature & Date			
		ı		