

Financial Institution Name: Location (Country) : JSCB "Tenge Bank" Uzbekistan, Tashkent

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 behavior to the control of the control

No#	Question	Answer
. ENTITY	/ & OWNERSHIP	
	Full Legal Name	
		Joint-Stock Commercial Bank "Tenge Bank"
	Append a list of foreign branches which are covered by	
	this questionnaire	
		All branches
	Full Legal (Decistored) Address	
	Full Legal (Registered) Address	
		66, Parkentskaya street, Tashkent city, Yashnabad district, Republic of Uzbekistan, 100007
		50, Farkertskaya street, Fastikert City, Fastiriabad district, Republic of Ozbekistari, 100007
		AND AND ADDRESS OF THE PARTY AND ADDRESS OF TH
1	Full Primary Business Address (if different from above)	
		New registration of the second
		grant the state of
;	Date of Entity incorporation/establishment	
		and additional and the second section of the second section of the second secon
		18.05.2019 y
		to Does the budge have placed the control and control and
	Solort type of awarrabin and append an awarrabin short	
	Select type of ownership and append an ownership chart if available	
•		No.
6 a 6 a1	Publicly Traded (25% of shares publicly traded) If Y, indicate the exchange traded on and ticker	No State of the st
aı	symbol	
	бушьог	The state of the s
b	Member Owned/Mutual	No
C	Government or State Owned by 25% or more	No
d	Privately Owned	Yes
d1	If Y, provide details of shareholders or ultimate	and the state of t
	beneficial owners with a holding of 10% or more	
		No. of the contract of the con
		Joint Stock Company «Halyk Bank of Kazakhstan».
	% of the Entity's total shares composed of bearer shares	
		No Month of the control of the contr
3	Does the Entity, or any of its branches, operate under an	
	Offshore Banking License (OBL)?	No
3 a	If Y, provide the name of the relevant branch/es	
	which operate under an OBL	
		The state of the s
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	
		The Central Bank of the Republic of Uzbekistan, the Department for Combating Economic Crimes under the
		General Prosecutor's Office of the Republic of Uzbekistan
		Contrary residence of the republic of experience
11	Provide Legal Entity Identifier (LEI) if available	
	Provide Legal Entity Identifier (LEI) if available	
		The second state of the second
		(8)
12	Provide the full legal name of the ultimate parent (if	STATE AND STATE OF THE STATE OF
	different from the Entity completing the DDQ)	Joint-Stock Bank "Halvk Bank"
		DOING-OLOGN DAIN TIAIYN DAIN
13	Jurisdiction of licensing authority and regulator of	
	ultimate parent	National Bank of Kazakhstan, The Agency of the Republic of Kazakhstan for Regulation and Development of
		Financial Market
14	Select the business areas applicable to the Entity	
4 a	Retail Banking	Yes
4 b	Private Banking	No No
4 c	Commercial Banking	Yes
4 d	Transactional Banking	Yes
4 e	Investment Banking	Yes
4 f	Financial Markets Trading	Yes
4 g	Securities Services/Custody	Yes
4 h	Broker/Dealer	No .
4 i	Multilateral Development Bank	No
4 j	Wealth Management	No
14 k	Other (please explain)	
	W	posted englished between the control of the land of the control of
		ASSESSED TO LOCAL DESIGNATION OF THE PARTY O
15	Does the Entity have a significant (10% or more) portfolio	
	of non-resident customers or does it derive more than	
	10% of its revenue from non-resident customers? (Non-	No No
	resident means customers primarily resident in a different jurisdiction to the location where bank services	ACCURATION OF THE PROPERTY OF

8. Norther of employees 1. Total Control Contr	5 a	If Y, provide the top five countries where the non- resident customers are located.	self gradeffeld geord
Service de Americane A Marches of Americanes De Control of Service de Americanes De Control of Service de Americanes A Service de Americanes B I Expregnesio, provide any assistantal information de Control of Service	6		
Confirm that all inspections provided in the above Section or operations will all be a treated in the above Section of the provided of the first section in the section is an experiment of the section o		Number of employees	
are processative of all the LEE formation. [15] 7 a	6 b		Between \$100 and \$500 million
and the bitarchicks at this applies to. ### Approximation and the provide any additional information-borderal to be the reviews in this section. ### Applies to be the provide in the following productils and sonneces ### Commonwealth British and the following productils and sonneces ### Commonwealth British and the following productils and sonneces ### Applies to be the following productils and sonneces ### Applies to be the following productils and sonneces ### Applies to be the following productils and sonneces ### Applies to be the following and the following productils and sonneces ### Applies to be the following and the following productils and sonneces ### Applies to be the following and the following productils and sonneces are proceeding and the following productils and t			Yes
by the exercise in the section. Describe Entire from the following products and services. 2 Commontal Setting of the following products and services. 2 Section 1 Commontal Setting of the following products and services. 2 Section 1 Commontal Setting of the Commontal Setting of the Setting of the Commontal Setting of the Setting of	17 a	If N, clarify which questions the difference/s relate to	
9 Cores the Entity offer for following products and services: 9 10 Cores the Entity offer Correspondent Banking 9 11 8Y 9 12 17 Correspondent Banking 9 12 18 9Y 9 18 19 19 19 19 19 19 19 19 19 19 19 19 19	18		tota egyani i Annot Syro-medi. J. Magail solm
9. a. Correspondent Barriera 19. at 10 19.			
19.1 If you can be Entity offer Correspondent Banking or control to the Correspondent			Voc
9 at a Does the Entity offer Correspondent Benindra (1997) and the Cor			Tes
Does the Entry allow comestic bank clients to the process of the p		Does the Entity offer Correspondent Banking	Yes
19 at 10 control of the control of t	19 a1b		
19 and 19	19 a1c	Does the Entity have processes and procedures	A STANKE THE SHARPER OF SHARPER AND A STANKE CO. C. P. P. S. S. S.
services to fortion banks? 19 at 10 19 at 10 19 at 10 19 at 10 19 at 11 10 at 11 10 at 11 10 at 11 10 at 11 11 at 11	19 a1d	domestic banks?	V-
with foreion basics? 19 and Description of the Common and Common		services to foreign banks?	
in place to identify downstream relationships with 50 persons banks? The process banks? The process banks? The process of the		with foreign banks?	No.
Services to regulated Money Value Transfer Businesses (MSB)MOney Value Transfer with MSB, MTSs, or Payment Service Provider with MSB, MTSs, or Payment Service Provider WSB, MTSs, or WSB, or WSB, MTSs, or WSB, o		in place to identify downstream relationships with foreign banks?	No
with MSRs, MVTSs, or Payment Service Provider [PSP312] 19 ah11 MSPs 19 1h1 Does the Entity have processes and procedures in place to identify downstream relationships with MSRs MVTSs/FSPx? 19 Lores-Border Bulk Cath Delivery No 19 Lores-Border Bulk Cath Delivery No 19 Cross-Border Remittances Ves 19 C	19 a1g	services to regulated Money Services Businesses (MSBs)/Money Value Transfer	No No
19 at 12	19 a1h	with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
19 at Does the Entity have processes and procedures in place to identify downstream relationships with No No No No No No No No	19 a1h1		
Does the Entity have processes and procedures in place to identify downstream relationships with No MSBs M/MSs/PSP2.			
19 b Cross-Border Bulk Cash Delivery Yes 19 c Cross-Border Remittances Yes 19 d Domestic Bulk Cash Delivery Yes 19 d Hoto Mail No 191 International Cash Letter No 191 International Cash Letter No 191 Levy Price Securities No 191 Psymbia Through Accounts Yes 191 Psymbia Through Accounts No 191 Psymbia Princyte Ton-Bank entities who may then offer third party jayment services to their customers? No 191	19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with	No
19 d Domestic Bulk Cash Delivery Yes 19 e Hold Mail No 19 hold Payabe Through Accounts 19 hold	19 b	Cross-Border Bulk Cash Delivery	
Hold Mail No No 19	19 с		
International Cash Letter No No			
19			
Payment services to non-bank entities who may then offer third party payment services to their customers? No offer third party Payment Services to their customers? No offer third party Payment Services Providers. No offer Service Providers. No offer Service Providers. No offer Service Providers. No offer Service Providers (VASPs) No offer Services to Walk-in customers places of VASPs (VASPs) No offer Services to Walk-in customers places of VASPs (VASPs) No offer Services to Walk-in customers places of VASPs (VASPs) No offer Services to Walk-in customers places of VASPs (VASPs) No offer Services to Walk-in customers places of VASPs (VASPs) No offer Services to Walk-in customers places of VASPs (VASPs) No offer Services to Walk-in customers places of VASPs (VASPs) No offer Services Services (VASPs) No offer Services S	19 g	Low Price Securities	No
19 12 Third Party Payment Service Providers No 19 13 Virtual Asset Service Providers (VASPs) No 19 14 eCommerce Platforms No 19 15 Other - Please explain 19 1 Private Banking No 19 1 Remote Deposit Capture (RDC) No 19 1 Sponsoring Private ATMs No 19 1 Sponsoring Private ATMs No 19 1 Trade Finance Yes 19 0 Virtual Assets No 19 p For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence 19 p1 Check cashing service No 19 p2 Wire transfers Yes 19 p2 Wire transfers Yes 19 p2 If yes, state the applicable level of due diligence 19 p3 If yes, state the applicable level of due diligence 19 p3 If yes, state the applicable level of due diligence 19 p3 If yes, state the applicable level of due diligence 19 p4 Sale of Mondary Instruments No 19 p4 If yes, state the applicable level of due diligence 19 p4 Sale of Mondary Instruments No 19 p4 If yes, state the applicable level of due diligence 19 p5 If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	19 h 19 i	Payment services to non-bank entities who may then	
19 19 19 19 19 19 19 19	19 i1	If Y , please select all that apply below?	
19 Id eCommerce Platforms No Other - Please explain 19 Private Banking No 19 k Remote Deposit Capture (RDC) No 19 l Sponsoring Private ATMs No 19 m Stored Value Instruments No 19 n Trade Finance Yes 19 o Virtual Assets No For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence 19 p1 Check cashing service No 19 p2 Wire transfers Yes 19 p2 Wire transfers Yes 19 p3 Foreign currency conversion Yes 19 p3 Foreign currency conversion Yes 19 p4 Sale of Monetary Instruments No 19 p5 If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence 19 p4 Other high-risk products and services identified by the Entity (please specify) 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	19 i2		
19 Private Banking No 19 k Remote Deposit Capture (RDC) No 19 k Remote Deposit Capture (RDC) No 19 m Stored Value Instruments No 19 m Stored Value Instruments No 19 p For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence. 19 p1 Check cashing service No 19 p1 Check cashing service No 19 p2 Wire transfers Yes 19 p2a If yes, state the applicable level of due diligence 19 p2 Wire transfers Yes 19 p3a If yes, state the applicable level of due diligence 19 p4 Sale of Monetary Instruments No 19 p4 Sale of Monetary Instruments No 19 p4 If you, state the applicable level of due diligence 19 p4 If you, state the applicable level of due diligence 19 p5 If you for other services to walk-in customers please provide more detail here, including describing the level of due diligence 19 p6 If you for other services to walk-in customers please provide more detail here, including describing the level of due diligence 19 q Other high-risk products and services identified by the Entity (please specify) 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	19 i3		
19 k Remote Deposit Capture (RDC) No 19 I Sponsoring Private ATMs No 19 m Stored Value Instruments No 19 n Trade Finance Yes 19 o Virtual Assets No 19 p For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence: 19 p1 Check cashing service 19 p2 Wire transfers Yes 19 p2 Wire transfers Yes 19 p3 Foreign currency conversion Yes 19 p3 Foreign currency conversion Yes 19 p3 Foreign currency conversion Yes 19 p4 Sale of Monetary instruments No 19 p4 Sale of Monetary instruments No 19 p4 Sale of Monetary instruments No 19 p4 If yes, state the applicable level of due diligence 19 p5 If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. 19 p6 Other high-risk products and services identified by the Entity (please specify) 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	19 i5	Other - Please explain	
19 I Sponsoring Private ATMs No 19 m Stored Value Instruments No 19 n Trade Finance Yes 19 0 Virtual Assets No 19 p For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence: 19 p1 Check cashing service No 19 p1a If yes, state the applicable level of due diligence 19 p2a If yes, state the applicable level of due diligence 19 p3 Foreign currency conversion Yes 19 p3 Foreign currency conversion No 19 p4 Sale of Monetary Instruments No 19 p4 Sale of Monetary Instruments No 19 p4 If yes, state the applicable level of due diligence 19 p4 Sale of Monetary Instruments No 19 p4 If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. 19 q Other high-risk products and services identified by the Entity (please specify) 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 21 If spropriate, provide any additional information/context	19 j	Private Banking	
19 m Stored Value Instruments No 19 n Trade Finance Yes 10 c Virtual Assets No 119 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 dilicence: 19 p1 Check cashing service No 19 p1 If yes, state the applicable level of due diligence 19 p2 Wire transfers Yes 19 p2 Wire transfers Yes 19 p3 Foreign currency conversion Yes 19 p3 Foreign currency conversion Yes 19 p4 Sale of Monetary Instruments No 19 p4 If yes, state the applicable level of due diligence 19 p4 Sale of Monetary Instruments No 19 p4 If yes, state the applicable level of due diligence 19 p5 If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. 19 q Other high-risk products and services identified by the Entity (please specify) 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	19 k	Remote Deposit Capture (RDC)	
19 n Trade Finance Yes 19 0 Virtual Assets No 19 p For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence. 19 p1 Check cashing service No 19 p1a If yes, state the applicable level of due diligence 19 p2 Wire transfers IYes 19 p2a If yes, state the applicable level of due diligence 19 p3a If yes, state the applicable level of due diligence 19 p4 Sale of Monetary Instruments No 19 p4 If yes, state the applicable level of due diligence 19 p4 If yes, state the applicable level of due diligence 19 p5 If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. 19 q Other high-risk products and services identified by the Entity (please specify) 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	19 I		
19 0 Virtual Assets			
For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence 19 p1	19 0	Virtual Assets	
19 p1a If yes, state the applicable level of due diligence 19 p2 Wire transfers Yes 19 p2a If yes, state the applicable level of due diligence 19 p3 Foreign currency conversion Yes 19 p3a If yes, state the applicable level of due diligence 19 p4 Sale of Monetary Instruments No 19 p4a If yes, state the applicable level of due diligence 19 p5 If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. 19 q Other high-risk products and services identified by the Entity (please specify) 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	19 p	offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p2	19 p1	Check cashing service	
19 p2a	19 p1a 19 p2	Wire transfers	Yes
19 p3a If yes, state the applicable level of due diligence 19 p4 Sale of Monetary Instruments No 19 p4a If yes, state the applicable level of due diligence 19 p5 If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. 19 q Other high-risk products and services identified by the Entity (please specify) 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	19 p2a	If yes, state the applicable level of due diligen	
19 p4 Sale of Monetary Instruments No 19 p4a If yes, state the applicable level of due diligence 19 p5 If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. 19 q Other high-risk products and services identified by the Entity (please specify) 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	19 p3		
19 p4a			
19 p5 If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. 19 q Other high-risk products and services identified by the Entity (please specify) 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	19 p4a	If yes, state the applicable level of due diligen	
the Entity (please specify) 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	19 p5	If you offer other services to walk-in customers please provide more detail here, including	
are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 21 If appropriate, provide any additional information/context	19 q		
are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 21 If appropriate, provide any additional information/context	20		Yes
		are representative of all the LE's branches. If N, clarify which questions the difference/s relate to	colored (from the Attin) described in a select constitution and
	20 a		presidence in the property of
			The state of the s

22	Does the Entity have a programme that sets minimum	
22.0	AML, CTF and Sanctions standards regarding the following components:	Von
22 a 22 b	Appointed Officer with sufficient experience/expertise Adverse Information Screening	Yes Yes
22 C	Beneficial Ownership	Yes
22 d	Cash Reporting	Yes
22 e	CDD	Yes
22 f	EDD	Yes
22 g	Independent Testing	Yes
22 h	Periodic Review	Yes
22 i	Policies and Procedures	Yes
22 j	PEP Screening	Yes
22 k	Risk Assessment	Yes
22 I	Sanctions	Yes
22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML,	1-10
24	CTF & Sanctions Compliance Department? Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior	
25	Management Committee? If N, describe your practice in Question 29. Does the Board receive, assess, and challenge regular	Yes
	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	The county of pattern of neutron and neutron
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	100
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	THE SECOND OF CONTRACT OF SECOND
29	If appropriate, provide any additional information/context to the answers in this section.	The content of the co
4. ANTI BI 30	RIBERY & CORRUPTION Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report	Yes
31	briberv and corruption? 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	Yes
33	coordinating the ABC programme? 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	Yes
35 b	advantage 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	Yes
37	effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular	Yes
38	reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment	
38 a	(EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was	Yes
30 a	completed.	cational business of transport as a service of the
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:	
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	No specifical
40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
40 с	Transactions, products or services, including those that involve state-owned or state-controlled entities	Yes
40 d	or public officials 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 corresponding for 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	Yes
42 d		Yes
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
42 f	Non-employed workers as appropriate	Voe
72.1	(contractors/consultants)	Yes
43	Does the Entity provide ABC training that is targeted to	Yes
44	specific roles, responsibilities and activities? Confirm that all responses provided in the above Section	
44	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.	All property and a second seco
	to the answers in this section.	And the second s
		201 CONTROL OF THE PARTY OF THE
E ABAL C	CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
40	consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent,	
46 a	detect and report: Money laundering	Yes
46 a	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least	Yes
10	annually? Has the Entity chosen to compare its policies and	
48	procedures against:	
48 a	U.S. Standards	Yes
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	Yes Yes
48 b1 49	If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that:	100
49 a	Prohibit the opening and keeping of anonymous and	Vac
	fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for	Yes
49 c	unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide	
43 6	banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides	Yes
49 f	services to shell banks Prohibit opening and keeping of accounts for Section	
401	311 designated entities	Yes
49 g	Prohibit opening and keeping of accounts for any of	The contract of the contract o
	unlicensed/unregulated remittance agents,	Yes
	exchanges houses, casa de cambio, bureaux de change or money transfer agents	10. Technic Die Errord (Applier Volle Chical III er Seile (1990)
49 h	Assess the risks of relationships with domestic and	influence or property and the second of the
	foreign PEPs, including their family and close	Yes
	associates (associated associated	
49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by	Yes
	employees	
49 j	Define the process, where appropriate, for	ser) 39 A not increased at enhancement at the property of
	terminating existing customer relationships due to	Yes
49 k	financial crime risk Define the process for exiting clients for financial	
43 K	crime reasons that applies across the entity,	Yes
	including foreign branches and affiliates	
49 1	Define the process and controls to identify and	Carlot Comment of the American State of the
	handle customers that were previously exited for financial crime reasons if they seek to re-establish a	Yes .
	relationship	
49 m	Outline the processes regarding screening for	Yes
	sanctions, PEPs and Adverse Media/Negative News	
49 n	Outline the processes for the maintenance of internal	Yes
50	"watchlists" Has the Entity defined a risk tolerance statement or	The California of the Californ
30	similar document which defines a risk boundary around	Yes
	their business?	
51	Does the Entity have record retention procedures that	Yes The second s
51 a	comply with applicable laws? If Y, what is the retention period?	
		5 years or more
52	Confirm that all responses provided in the above Section	Yes
E2 -	are representative of all the LE's branches If N, clarify which questions the difference/s relate to	
52 a	and the branch/es that this applies to.	
	and any approximation	at seril primer sich der Swarn Silber aus heven gemit den begen ist.
		TAK
53	If appropriate, provide any additional information/context	
	to the answers in this section.	Bank there is a procedure for identifying and checking the entities designated in Section 311 using applications.
		World check and Transaction Screening. If an alert is raised the bank suspends transaction and hold any entity's accounts
		accounts the second sec
	TF & SANCTIONS RISK ASSESSMENT	
6. AML, C	Does the Entity's AML & CTF EWRA cover the inherent	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Vas
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes Yes
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Yes Yes
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls	Yes Yes
54 a 54 b 54 c 54 d 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes Yes Yes
54 a 54 b 54 c 54 d 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls	Yes Yes
54 a 54 b 54 c 54 d 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes Yes Yes Yes Yes Yes Yes Yes

55 g 55 h		
55 h		Yes
	Management Information	Yes
56	Has the Entity's AML & CTF EWRA been completed in	Yes
FO -	the last 12 months? If N, provide the date when the last AML & CTF	
56 a	EWRA was completed.	
	EWKA was completed.	
57	Does the Entity's Sanctions EWRA cover the inherent	
	risk components detailed below:	
57 a	Client	Yes
57 b	Product	Yes
57 c	Channel	Yes
57 d	Geography	Yes
58	Does the Entity's Sanctions EWRA cover the controls	
FO -	effectiveness components detailed below:	Yes
58 a	Customer Due Diligence	Yes
58 b	Governance	
58 c	List Management	Yes
58 d	Management Information	Yes
58 e	Name Screening Transaction Screening	Yes Yes
58 f		Yes
58 g 59	Training and Education Has the Entity's Sanctions EWRA been completed in the	
99	last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA	
00 a	was completed.	
	was completed.	
		The state of the s
60	Confirm that all responses provided in the above Section	Yes
20 -	are representative of all the LE's branches	
60 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
		16 10 10 10 10 10 10 10 10 10 10 10 10 10
61	If appropriate, provide any additional information/context	
	to the answers in this section.	
		Construction and Constr
7 KVC CE	DD and EDD	
	DD and EDD	Voc
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	Yes
	CDD must be completed, e.g. at the time of onboarding	Tes .
64	or within 30 days? Which of the following does the Entity gather and retain	
64		
64 a	when conducting CDD? Select all that apply: Customer identification	Yes
64 a	Expected activity	Yes
64 b	Nature of business/employment	Yes
64 c	Ownership structure	Yes
64 a	Product usage	Yes
	Purpose and nature of relationship	Yes
64 f 64 g	Source of funds	Yes
	Source of funds Source of wealth	Yes
64 h	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
JUAI	Authorised signatories (where applicable)	Yes
65 b		Yes
65 b	Key controllers	
65 c	Key controllers Other relevant parties	
65 c 65 d	Other relevant parties	Yes
65 c	Other relevant parties What is the Entity's minimum (lowest) threshold applied	
65 c 65 d 66	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	Yes 10%
65 c 65 d	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers	Yes
65 c 65 d 66	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification?	Yes 10%
65 c 65 d 66	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the	Yes 10%
65 c 65 d 66	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification?	Yes 10%
65 c 65 d 66 67	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	Yes 10% Yes
65 c 65 d 66 67 67 a 67 a1	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage	Yes 10% Yes Yes
65 c 65 d 66 67 67 a 67 a1 67 a2	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography	Yes 10% Yes Yes Yes Yes
65 c 65 d 66 67 67 a 67 a 67 a1 67 a2 67 a3	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply; Product Usage Geography Business Type/Industry	Yes 10% Yes Yes Yes Yes Yes
65 c 65 d 66 67 67 a 67 a 67 a 67 a 67 a 67 a 67	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type	Yes 10% Yes Yes Yes Yes Yes Yes Yes
65 c 65 d 66 67 67 a 67 a 67 a 67 a 67 a 67 a 67	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information	Yes 10% Yes Yes Yes Yes Yes Yes Yes
65 c 65 d 66 67 67 a 67 a 67 a 67 a 67 a 67 a 67	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information	Yes 10% Yes Yes Yes Yes Yes Yes Yes
65 c 65 d 66 67 67 a 67 a 67 a 67 a 67 a 67 a 67	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information	Yes 10% Yes Yes Yes Yes Yes Yes Yes
65 c 65 d 66 67 67 a 67 a 67 a 67 a 67 a 67 a 67	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify)	Yes 10% Yes Yes Yes Yes Yes Yes Yes Yes Yes
65 c 65 d 66 67 67 a 67 a 67 a 67 a 67 a 67 a 67	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a	Yes 10% Yes Yes Yes Yes Yes Yes Yes
65 c 65 d 66 67 67 a 67 a1 67 a2 67 a2 67 a3 67 a4 67 a5 67 a6	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process?	Yes 10% Yes Yes Yes Yes Yes Yes Yes Yes Yes
65 c 65 d 66 67 67 a 67 a1 67 a2 67 a3 67 a4 67 a5 67 a6	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at:	Yes 10% Yes Yes Yes Yes Yes Yes Yes Yes Yes
65 c 65 d 66 67 67 a 67 a 67 a 67 a 67 a 67 a 67	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding	Yes 10% Yes
65 c 65 d 66 67 67 a 67 a1 67 a2 67 a2 67 a4 67 a5 67 a6 68 a 68 a 68 a1 68 a2	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply; Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal	Yes 10% Yes
65 c 65 d 66 67 67 a 67 a1 67 a2 67 a3 67 a4 67 a5 67 a6 68 a 68 a 68 a1 68 a2 68 a3	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event	Yes 10% Yes
65 c 65 d 66 67 67 a 67 a 67 a 2 67 a 3 67 a 4 67 a 5 67 a 6 68 a 68 a 1 68 a 2 68 a 3 68 a 4 68 a 4	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other	Yes 10% Yes
65 c 65 d 66 67 67 a 67 a1 67 a2 67 a3 67 a4 67 a5 67 a6 68 a 68 a 68 a1 68 a2 68 a3	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event	Yes 10% Yes
65 c 65 d 66 67 67 a 67 a 67 a 2 67 a 3 67 a 4 67 a 5 67 a 6 68 a 68 a 1 68 a 2 68 a 3 68 a 4 68 a 4	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other	Yes 10% Yes
65 c 65 d 66 67 67 a 67 a 67 a 2 67 a 3 67 a 4 67 a 5 67 a 6 68 a 68 a 1 68 a 2 68 a 3 68 a 4 68 a 4	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other	Yes 10% Yes
65 c 65 d 66 67 67 a 67 a 67 a1 67 a2 67 a3 67 a4 67 a5 67 a6 68 68 68 a 68 a1 68 a2 68 a3 68 a4 68 a4a	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other"	Yes 10% Yes
65 c 65 d 66 67 67 a 67 a 67 a 2 67 a 3 67 a 4 67 a 5 67 a 6 68 a 68 a 1 68 a 2 68 a 3 68 a 4 68 a 4	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other"	Yes 10% Yes
65 c 65 d 66 67 67 a 67 a 67 a1 67 a2 67 a3 67 a4 67 a5 67 a6 68 68 a 68 a1 68 a2 68 a3 68 a4 68 a44	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other"	Yes 10% Yes
65 c 65 d 66 67 67 a 67 a 67 a1 67 a2 67 a3 67 a4 67 a5 67 a6 68 68 a 68 a1 68 a2 68 a3 68 a4 68 a44	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other" Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes 10% Yes
65 c 65 d 66 67 67 a 67 a1 67 a2 67 a4 67 a5 67 a6 68 68 68 68 68 68 68 68 68 68 68 68 68	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other" Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? If Y, is this at:	Yes 10% Yes
65 c 65 d 66 67 67 a 67 a1 67 a2 67 a3 67 a4 67 a5 67 a6 68 68 68 a 68 a1 68 a2 68 a3 68 a4 68 a4 69 69 69 69 69 69 69 69 69 69 69	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other" Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? If Y, is this at: Onboarding	Yes 10% Yes
65 c 65 d 66 67 67 a 67 a 67 a1 67 a2 67 a3 67 a4 67 a5 67 a6 68 68 68 a 68 a1 68 a2 68 a3 68 a4 68 a4 68 a4 69 69 69 a 69 a 69 a1 69 a2	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal KYC renewal	Yes 10% Yes
65 c 65 d 66 67 67 a 67 a 67 a1 67 a2 67 a4 67 a5 67 a6 68 68 68 a1 68 a2 68 a3 68 a4 68 a4a 69 a1 69 a2 69 a3	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event Other	Yes 10% Yes
65 c 65 d 66 67 67 a 67 a 67 a1 67 a2 67 a3 67 a4 67 a5 67 a6 68 68 a 68 a1 68 a2 68 a3 68 a4 68 a4 68 a4 68 a4 68 a4	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC, process? If Y, is this at: Onboarding KYC renewal Trigger event Other Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event Trigger event With its at: Onboarding KYC renewal Trigger event	Yes 10% Yes
65 c 65 d 66 67 67 a 67 a 67 a1 67 a2 67 a3 67 a4 67 a5 67 a6 68 68 a 68 a1 68 a2 68 a3 68 a4 68 a4a 69 69 69 a 69 a1 69 a2 69 a3 70	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event Trigger event Trigger event Trigger event Uses the Entity have a risk based approach to screening customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event Trigger event Trigger event	Yes 10% Yes
65 c 65 d 66 67 67 a 67 a 67 a1 67 a2 67 a4 67 a5 67 a6 68 68 68 a 68 a1 68 a2 68 a3 68 a4 68 a4a	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening	Yes 10% Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes Combination of automated and manual
65 c 65 d 66 67 67 a 67 a 67 a1 67 a2 67 a3 67 a4 67 a5 67 a6 68 a 68 a1 68 a2 68 a3 68 a4 68 a4a 69 69 a 69 a1 69 a2 69 a3 70	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other" Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event Uses the Entity have a risk based approach to screening customers for Adverse Media/Negative News? Does the Entity have a risk based approach to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether	Yes 10% Yes
65 c 65 d 66 67 67 a 67 a 67 a1 67 a2 67 a3 67 a4 67 a5 67 a6 68 a 68 a1 68 a2 68 a3 68 a4 68 a4a 69 69 a 69 a1 69 a2 69 a3 70	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening	Yes 10% Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes Combination of automated and manual
65 c 65 d 66 67 67 a 67 a1 67 a2 67 a3 67 a4 67 a5 67 a6 68 68 68 a 68 a1 68 a2 68 a3 68 a4 68 a4 69 69 69 a 69 a1 69 a2 69 a3 70 71	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other" Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event Other Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes 10% Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes Combination of automated and manual
65 c 65 d 66 67 67 a 67 a1 67 a2 67 a3 67 a5 67 a6 68 68 a 68 a1 68 a1 68 a2 68 a3 68 a4 69 69 69 a 69 a1 69 a2 69 a3 70 71	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC, process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other" Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event Uster Trigger event Trigger event Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes Yes Yes Yes Yes Yes Yes Yes
65 c 65 d 66 67 67 a 67 a 67 a1 67 a2 67 a3 67 a4 67 a5 67 a6 68 68 a 68 a1 68 a2 68 a3 68 a4 68 a4 68 a2 69 a1 69 a2 69 a3 70 71	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other" Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding	Yes 10% Yes
65 c 65 d 66 6 67 a 67 a 67 a 67 a2 67 a3 67 a5 67 a6 68 a 68 a 68 a1 68 a2 68 a3 68 a4 69 69 a 69 a1 69 a2 69 a3 70 71	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC, process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other" Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? If Y, is this at: Onboarding KYC renewal Trigger event Uster Trigger event Trigger event Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes Yes Yes Yes Yes Yes Yes Yes

72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes	20 P 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
	to review and escalate potential matches from screening	
	customers and connected parties to determine whether	Yes
	they are PEPs, or controlled by PEPs?	
74	Is KYC renewed at defined frequencies based on risk	Yes
	rating (Periodic Reviews)?	Tes
74 a	If yes, select all that apply:	
74 a1	Less than one year	Yes
74 a2 74 a3	1 – 2 years 3 – 4 years	Tes
74 a4	5 years or more	always subject
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	west transfer that the transfer of the transfer transfer the transfer of the t
	B. H. F. W. Waldeland and making an arrest	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
	and past periodic of trigger event due unigenee reviewe.	
76	From the list below, which categories of customers or	
	industries are subject to EDD and/or are restricted, or	
	prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Prohibited
76 b 76 b1	Respondent Banks If EDD or restricted, does the EDD assessment	Always subject to EDD
1001	contain the elements as set out in the Wolfsberg	Yes
	Correspondent Banking Principles 2022?	cedinal and a minute property of the contract
76 c	Embassies/Consulates	Always subject to EDD
76 d	Extractive industries	Always subject to EDD Prohibited
76 e 76 f	Gambling customers General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	EDD on risk-based approach
76 i	Non-account customers	EDD on risk-based approach
76 j	Non-Government Organisations	EDD on risk-based approach Always subject to EDD
76 k 76 l	Non-resident customers Nuclear power	Prohibited
76 m	Payment Service Providers	EDD on risk-based approach
76 n	PEPs	Always subject to EDD
76 o	PEP Close Associates	Always subject to EDD
76 p	PEP Related	Always subject to EDD
76 q	Precious metals and stones Red light businesses/Adult entertainment	EDD on risk-based approach Prohibited
76 r 76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v	Unregulated charities	Prohibited
76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers Other (specify)	Always subject to EDD
76 y	Other (specify)	
		Y ARREST TO THE PARTY OF THE PA
77	If restricted, provide details of the restriction	serious contrata de la contrata del contrata de la contrata del contrata de la contrata del contrata de la contrata de la contrata de la contrata del contrata de la contrata del contrata de la contrata de la contrata del co
		ANY TOUR DESCRIPTION OF THE PROPERTY OF THE PR
		A STATE OF THE STA
78	Does EDD require senior business management and/or	Yes
	compliance approval?	
78 a 79	If Y indicate who provides the approval: Does the Entity have specific procedures for onboarding	Both
79	entities that handle client money such as lawyers,	Yes
	accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or quality	Yes
	review on clients subject to EDD?	100
81	Confirm that all responses provided in the above Section	Yes
81 a	are representative of all the LE's branches If N, clarify which questions the difference/s relate to	
ora	and the branch/es that this applies to	
	and the second s	
82	If appropriate, provide any additional information/context	
	to the answers in this section.	
		The state of the s
8. MONIT	TORING & REPORTING	
83	Does the Entity have risk based policies, procedures and	
	monitoring processes for the identification and reporting	Yes
84	of suspicious activity? What is the method used by the Entity to monitor	
34	transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what type	
	of transactions are monitored manually	Unusual and non-standart transactions
		Onacida de Horretanda transacione
84 b	If automated or combination selected, are internal	Internal System
84 b1	system or vendor-sourced tools used? If 'Vendor-sourced tool' or 'Both' selected, what is	
04 DT	the name of the vendor/tool?	AND SHARE SH
	and the following the following the first the	THE CORNER OF CHILD AND THE CONTROL OF CHILD AND CONTROL OF CONTROL OF CHILD
		A SALE STREET, AND A SALE STREET,
	When was the tool last updated?	1.2 years
84 b2	When was the tool last updated? When was the automated Transaction Monitoring	1-2 years
	When was the automated Transaction Monitoring	
84 b2		<1 year
84 b2 84 b3	When was the automated Transaction Monitoring application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions?	
84 b2 84 b3	When was the automated Transaction Monitoring application last calibrated? Does the Entity have regulatory requirements to report	<1 year

CBDDQ V1.4

00		
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the	Yes
	monitoring of customer transactions and activity?	THE PARTY OF THE P
87	Does the Entity have a data quality management programme to ensure that complete data for all	Yes
88	transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a	Yes
89	timely manner? Does the Entity have processes in place to send	V
90	Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section	Yes
90 a	are representative of all the LE's branches If N, clarify which questions the difference/s relate to	Yes
	and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	
9. PAYME	NT TRANSPARENCY Does the Entity adhere to the Wolfsberg Group Payment	
32	Transparency Standards?	Yes
93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure	
93 a	compliance with: FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	Rules of internal control on combating legalization of proceeds from criminal activity, financing of terrorism and financing the proliferation of weapons of mass destruction in commercial banks (№ 2886, 23.05.2017)
93 с	If N, explain	Participant de la companya del companya del companya de la company
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section	Yes
96 a	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.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC		
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law	and the product of the control of th
	applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100		
	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of	Yes
	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?	AND THE PARTY OF T
101	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	AND THE PARTY OF T
	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? What is the method used by the Entity for sanctions	and and an overly comprehense in the particular plantage of the particular plantage of the particular plantage of the particular plantage of the particular particular plantage of the particular part
101	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? What is the method used by the Entity for sanctions screening? If 'automated' or 'both automated and manual' selected:	Yes
101 102 102 a 102 a1	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? What is the method used by the Entity for sanctions screening? If 'automated' or 'both automated and manual' selected: Are internal system of vendor-sourced tools	Yes
101 102 102 a	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? What is the method used by the Entity for sanctions screening? If 'automated' or 'both automated and manual' selected:	Yes Both Automated and Manual
101 102 102 a 102 a1	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? What is the method used by the Entity for sanctions screening? If 'automated' or 'both automated and manual' selected: Are internal system of vendor-sourced tools If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the	Yes Both Automated and Manual Both Transaction Screening
101 102 102 a 102 a1 102 a1a	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? What is the method used by the Entity for sanctions screening? If 'automated' or 'both automated and manual' selected: Are internal system of vendor-sourced tools If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? 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 Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions	Yes Both Automated and Manual Both Transaction Screening
101 102 102 a 102 a1 102 a1a	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? What is the method used by the Entity for sanctions screening? If 'automated' or 'both automated and manual' selected: Are internal system of vendor-sourced tools If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? 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 exolain in Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information,	Yes Both Automated and Manual Both Transaction Screening < 1 year
101 102 102 a 102 a1 102 a1 102 a2	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? What is the method used by the Entity for sanctions screening? If alumated' or 'both automated and manual' selected: Are internal system of vendor-sourced tools If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? 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' blease exolain in Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? What is the method used by the Entity? Does the Entity have a data quality management programme to ensure that complete data for all	Yes Both Automated and Manual Both Transaction Screening < 1 year Yes
101 102 102 a 102 a1 102 a1a 102 a1a	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? What is the method used by the Entity for sanctions screening? If 'automated' or 'both automated and manual' selected: Are internal system of vendor-sourced tools If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? 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 Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? What is the method used by the Entity? Does the Entity have a data quality management	Yes Both Automated and Manual Both Transaction Screening < 1 year Yes Combination of automated and manual

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	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Foreign Assets Control (OFAC) Office of Financial Sanctions Implementation HMT	
	(OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d 106 e	European Union Consolidated List (EU) Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data Used for filtering transactional data
106 f	Other (specify)	Good for morning manuactorial data
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	
107 a	systems against: Customer Data	Within 3 to 5 business days
107 b	Transactions	Within 3 to 5 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	Yes
109 a	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.	
110	If appropriate, provide any additional information/context to the answers in this section.	AND SECURITION OF THE TOP SECURITION OF THE
11. TRAININ	G & EDUCATION	
111	Does the Entity provide mandatory training, which	
111 a	includes: Identification and reporting of transactions to	Yes
111 b	government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant	Yes
111 c	for the types of products and services offered 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 112	Fraud Is the above mandatory training provided to :	Yes
112 a	Board and Senior Committee Management	Yes
112 b 112 c	1st Line of Defence 2nd Line of Defence	Yes Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
112 f 113	Non-employed workers (contractors/consultaints) 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 .
115 115 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.	Yes
116	If appropriate, provide any additional information/context to the answers in this section.	AND
12. QUALITY	Y ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from	Yes
118	the independent Audit function)? Does the Entity have a program wide risk based Compliance Testing process (separate from the	Yes
119	independent Audit function)? Confirm that all responses provided in the above Section	PATE SURENZ DESCRIPTION AND THE REPORTED AND
119 a	are representative of all the LE's branches If N, clarify which questions the difference/s relate to	Yes
119 a	and the branch/es that this applies to.	The second secon
120	If appropriate, provide any additional information/context to the answers in this section.	g street & definition in the
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
	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 122 a 122 b	How often is the Entity audited on its AML, CTF, ABC,	Yearly Yearly

123 a	AML, CTF, ABC, Fraud and Sanctions policy and	
125 a	procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 с	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123 I	Other (specify)	
124	Are adverse findings from internal & external audit	
124	tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
14. FRAI	ID	
127	Does the Entity have policies in place addressing fraud	Yes
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes
129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 а	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)

Joint-Stock Commercial Bank "Tenge Bank" (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

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.

of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are and that I am authorised to execute this declaration on behalf of the Financial Institution. I,Faleyev Baibit Khamitovich (Global Heacomplete and corregt to my honest belief

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 to execute this declaration on behalf of the Financial Institution.

(Signature & Date) (Signature & Date

Muartin GBDP