

Financial Institution Name: Location (Country):

"PRAVEX BANK" Joint Stock Company	
Ukraine	

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial institution should answer the questionnaire at the legal entity level including any branches for which the citent base, products and control model are materially almiter 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 the 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 site.) is materially different than its Entity Head Office, a separate questionnaire can be controlled for that the response for the LE differs for the LE difference captured at the end of each sub-section. If a branch's business activity (products offered, client base site.) is materially different than its Entity Head Office, a separate questionnaire can be controlled for the party.

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National Bank of Ukraine Provide Legal Entity Identifier (LEI) if available 14360920 Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	National Bank of Ukraine Provide Legal Entity Identifier (LEI) if available 14360920 Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ) INTESA SANPAOLO S.p.A. Jurisdiction of Ilcensing authority and regulator of ultimate parent	
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12 Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ) INTESA SANPAOLO S.p.A. Jurisdiction of licensing authority and regulator of ultimate parent	
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INTESA SANPAOLO S.p.A.	Jurisdiction of licensing authority and regulator of ultimate parent	
1	parent	
	parent	
13 Jurisdiction of licensing authority and requisitor of ultimetal	parent	·
	14 Select the business areas applicable to the Entity	
14 Select the business areas applicable to the Entity	16 I NAME TO BE PUBLISHED BOOK BOOK BOOK TO BE CARRY	

14 a	Retail Banking	Yes
14 b	Private Banking	Yes
14 c	Commercial Banking	Yes
14 d	Transactional Banking	No
14 e	Investment Banking	No
14 f	Financial Markets Trading	Yes
<u>14 g</u>	Securities Services/Custody	Yes
14 h	Broker/Dealer	Yes
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	<u> </u>
15 a	If Y, provide the top five countries where the non- resident cusfomers are located.	
16	Select the closest value:	
16 a	Number of employees	
16 b	Total Assets	501-1000
17	Confirm that all responses provided in the above Soction	Between \$100 and \$500 million
	ara representative of all the LE's branches.	Yes
17 a	If N, clarify which questions the difference/s relate to end the brench/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	
5. 555VAS		
19	DOEs the Entity offer the following products and services:	
19 a	Correspondent Banking	Yes
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	Yes
19 a1b	Does the Entity allow domestic bank clients to	Nó
19 a1c	provide downstream relationships? Does the Entity have processes and procedures in place to idontify downstream relationships with domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Yes
19 a1e	Does the Entity allow downstream relationships with foreign banks?	No
19 a1f	Does the Entity have processes and proceduras in	No
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	Yes
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	No
19 a1h2	MVTSs	No .
19 a1h3		No

19 a1l	Does the Entity have processes and proceduras in place to identify downstream relationships with MSBs /MVTSs/PSPs?	No
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	No No
19 e	Hold Mail	
		No .
19 f	International Cash Letter	No
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
19 í	Payment services to non-bank entities who may then offer third party payment services to their customers?	No
19 i1 19 i2	If Y , please select all that apply below? Third Party Payment Service Providers	
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	
19 j	Private Banking	Both
19 k	Remote Deposit Capture (RDC)	Yes
19 I	Sponsoring Private ATMs	
		Yes
19 m	Stored Value Instruments	Yes
19 n	Trade Finance	Yes
19 o	Virtual Assets	
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	9
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	ė
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	Yes
70	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 to the answers in this section.	
3. AML, C	TF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regerding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	Yes
22 b	Adverse Information Screening	Yes
22 c	Beneficial Ownership	Yes
22 d	Cash Reporting	
		Yes
22 6	CDD	Yes
22 1	EDO	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 1	Sanctions	
	J. Seriousia	Yes

22 m	Civarialous Activity Danselle	
22 m	Suspicious Activity Reporting Training and Education	Yes Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML.	11-100
24	CTF & Sanctions Compliance Department? Is the Entity's AML, CTF & Sanctions policy approved at	i
	least annually by the Board or equivalent Senior	
	Management Committee? If N, describe your practica in	No
	Question 29.	
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?	Yes
26 a	If Y, provide further details	
27	Door the artiky house and latter blank in	<u></u>
28	Does the entity have a whistleblower policy? Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	Yes
28 a	If N, clarify which questions the difference/s rolate to	
	and the branch/es that this applies to.	
		1
29	N convenients and different	
43	If appropriate, provide any additional information/context to the answers in this section.	1
		Entity's AML, CTF and Senctions policy is approved by Board on the proposal of Appointed officer, usually when
		changes in local AML legislation or Group requirements and respectively in internal policy.
4. ANTI E	BRIBERY & CORRUPTION	
30	and and process of the biocedings	
	consistent with applicable ABC regulations and	Yes
	requirements to reasonably prevent, detect and report bribery and corruption?	
31	Does the Entity have an enterprise wide programme that	
<u> </u>	sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers	
	with sufficient experience/expertise respensible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate	
	levels of experience/expertise to implement the ABC	Yes
34	Is the Entity's ABC programme applicable to:	
35	Does the Entity have a global ABC policy that:	Both joint ventures and third parties acting on behalf of the Entity
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 improperty intended to influence action or obtain an	Yes
	advantace	
35 b	Includes enhanced requirements regarding Interaction with public officials?	Va.
35 €		
33 E	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	
37	effectiveness of their ABC programme?	Yes
o.i	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	
	(FMPA) have completed in the less to	Yes
38 a	If N, provide the date when the last ABC EWRA was	
	completed.	
		1
39	Does the Entity have an ABC residuel risk rating that is	
- •		Yes
	inherent risk assessment?	190
40	Does the Entity's ABC EWRA cover the inherent risk	udalijo granje kojo je jeda je sa sala jega sa ta izi organ gala kojo ka izi za kaja je sa izi kaja je kaja je
10 a	Potential liability created by intermediaries and other	Hadron and soil and a specific to the second
	third-party providers as appropriate	Yes
10 Б	Corruption risks associated with the countries and	
	industries in which the Entity does business, directly or	Yes
10 c	through intermediaries Transactions, products or services, including those	
-	that involve state-owned or state-controlled entities or	Yes
	public officials	·
	public officials	

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 end 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	3rd Line of Defence	Yes
42 e	Third parties to which specific compilance activities subject to ABC risk have been outsourced	Not Applicable
42 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section	Yes
44 a	are representative of all the LE's branches	
448	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.	
	TE & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements fo reasonably prevent, detect and report:	
46 a	Money laundering	· · · · · · · · · · · · · · · · · · ·
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47		Yes
	Are the Entity's policies and procedures updated at least annually?	No ·
48	Has the Entity chosen to compare its policies and	
	procedures against:	Called the Company of the Called Called Company (Called Called Company) and the Called
48 a	U.S. Standards	Yes
48 a1	If Y, does the Entity retain a record of the results?	Yes
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	Yes
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section	Yes
49 g	311 designated entities Prohibit opening and keeping of accounts for eny of unlicensed/unregulated remittance agents, exchanges houses, case de cambio, bureaux de change or money transfer agents	
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes

49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
49 j	Define the process, where apprupriate, for terminating existing customer relationships due to financial crime risk	
49 k	Define the process for exiting clients forfinancial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
49	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 ell 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.	Q.47 Entity's policies and procedures are updated when changes in local legislation or in some internal procedures.
	to the answers in this section.	procedures.
	to the answers in this section.	
6: AML C 64	to the answers in this section. IF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA gover the inherent risk components detailed below: Client	procedures. Yes
54 a 54 b	to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	procedures. Yes Yes
54 a 54 b 54 c	to the answers in this section. IF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	yes Yes Yes
6: AML, C 54 54 a 54 b	to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	procedures. Yes Yes
6. AML, C 54 a 54 b 54 c 54 d 55 c	to the answers in this section. TF & SANCTIONS RISK ASSESSMENT 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	Procedures. Yes Yes Yes Yes Yes Yes
5. AML C 54 54 a 54 b 54 c 54 d 55 55 a 55 b	to the answers in this section. IF & SANCTIONS RISK ASSESSMENT 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	yes Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 5 5 5 5 5 c 55 c	to the answers in this section. IF & SANCTIONS RISK ASSESMENT 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 Yes
54 a 54 b 54 c 54 d 55 a 55 b	to the answers in this section. IF & SANCTIONS RISK ASSESSMENT 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 Name Screening against Adverse Media/Negative	yes Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 b 55 c 55 b 55 c 55 d 65 6	to the answers in this section. TF & SANCTIONS RISK ASSESSMENT 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 Name Screening against Adverse Media/Negative News	procedures. Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
54 a 54 b 54 c 54 d 55 55 55 55 5 5 5 5 5 5 5 5 5 5 5	to the answers in this section. IF & SANCTIONS RISK ASSESSMENT 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 Name Screening against Adverse Media/Negative	yes Y
54 a 54 b 54 c 54 d 55 d 55 c 55 d 55 e 55 f	to the answers in this section. IF & SANCTIONS RISK ASSESSMENT 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 Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	yes Y
54 a 54 b 54 c 54 d 55 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	to the answers in this section. IF & SANCTIONS RISK ASSESMENT 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 Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	yes Y
8. AML C 54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 c 55 c 55 c	to the answers in this section. TF & SANCTIONS RISK ASSESSMENT 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 Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in	yes Y
6 AML C 54 a 54 b 54 c 54 d 55 a 55 a 55 c 55 c 55 c 55 c 55 f 55 g 55 h 56	to the answers in this section. IF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA gover 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 Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	yes Y
6. AML C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 d 55 e	to the answers in this section. IF & SANCTIONS RISK ASSESSMENT 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 Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Dees the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	yes Y
6. AML C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 56 e 55 f 55 c 55 d 56 e 57 57 a 57 b	to the answers in this section. IF & SANCTIONS RISK ASSESMENT 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 Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Dees the Entity's Sanctions EWRA cover the Inherent risk components detailed below: Client Product	yes Y
6. AMIL C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 d 56 e 56 a 57 57 a 57 c	to the answers in this section. IF & SANCTIONS RISK ASSESSMENT 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 Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Dees the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	yes Y
6 AML C 54 54 a 54 b 54 c 54 d 55 55 b 55 c 55 c 55 d 65 e 55 f 55 g 55 h 56 56 a	to the answers in this section. IF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA gover 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 Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Dees the Entity's Sanctions EWRA cover the Inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	yes Y
6. AML C 54 54 a 54 b 54 c 55 d 55 a 55 b 55 c 55 d 55 c 55 d 55 e 55 d 56 e 57 57 a 57 b 57 c 57 d 58	to the answers in this section. IF & SANCTIONS RISK ASSESSMENT 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 Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Dees the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	procedures. Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
6 AMIL C 54 54 a 54 b 54 c 54 d 55 65 a 55 b 65 c 65 c 65 d 65 e 55 f 55 g 55 h 56 57 a 57 a 57 b 57 c 57 d 58 58 a	to the answers in this section. IF & SANCTIONS RISK ASSESSMENT 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 Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the lest 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Dees the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	procedures. Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
54 a 54 b 54 c 54 d 55 5 5 5 5 5 5 5 5 5 6 5 6 6 5 6 6 5 6	to the answers in this section. IF & SANCTIONS RISK ASSESSMENT 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 Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Dees the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	procedures. Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye

58 e 58 f 58 g 59	Name Screening Transaction Screening	Yes Yes
58 g		/ Vac
59	Training and Education	Yes
~~	Has the Entity's Sanctions EWRA been completed in the	Yes
	last 12 months?	
59 a	If N, provide the date when the last Sanctions EWRA	
	was completed.	
	· ·	
60	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	103
60 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
	i '	
	Ì	
	<u></u>	
61	If appropriate, provide any additional information/context	•
	to the answers in this section.	
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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	
		Yes
	or within 30 days?	
64	Which of the following does the Entity gather and retain	
	when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
	Nature of business/employment	
64 c		Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
641	Purpose and nature of relationship	Yes
<u>84 g</u>	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	S LOGGE STREET TO THE WORLD ASSET OF TAKEN SPECIAL PROPERTY OF THE STREET OF THE STREET SPECIAL SPECIA
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	25%
	beneficial ownership identification?	
67	Does the due diligence process result in customers	Yes
	receiving a risk classification?	
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)	
~! ***	Anim (mhannil)	
		Customer's (customer representative's) behavior
		• ''
	<u> </u>	
68	For high risk non-individual customers, is a site visit a part	
	of your KYC process?	
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4	Other	100
68 a4a	If yas, please specify "Other"	
30 d48	n yas, piease specity "Other"	
	1	
69	Oces the Entity have a risk based approach to screening	
30		Man.
	customers for Adverse Media/Negative News?	Yes
	If Y, is this at:	
69 a		
69-a1	Onboarding	Yes
	Onboarding	Yes Yes

E9 =2	Trigger overt	No.
69 a3 70	Trigger event	Yes
. •	What is the method used by the Entity to screen for Adverse Media/Negative News?	Manual
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether	
	they are PEPs, or controlled by PEPs?	Yes
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?	Combination of automated end manual
73	Does the Entity have policies, procedures and processes	
	to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk	Yes
74 a	rating (Periodic Reviews)? If yes, select all that apply:	
74 a1	Less than one year	No
74 a2	1 – 2 years	Yes
74 a3	3 - 4 years	Yes
74.a4	5 years or more	No
74 a5	Trigger-based or perpetual monitoring reviews	
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	Prohibited
76 b	Respondent Banks	Always subject to EDD
76 b1	If EDD or restricted, does the EDD assessment contain the airments as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	Always subject to EDD
76 d	Extractive industries	Always subject to EDD
76 e	Gambling customers	Do not have this category of customer or industry
76 f	General Trading Companies	Do not have this category of customer or industry
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	Always subject to EDD
761	Non-account customers	Always subject to EDD
76 j	Non-Government Organisations	Always subject to EDD
76 k 76 l	Non-resident customers Nuclear power	EDD on risk-based approach
76 m	Payment Service Providers	Always subject to EDD
76 n	PEPs PEPs	Always subject to EDD 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	Do not have this category of customer or industry
76 r	Red light businesses/Adult entertainment	Prohibited
76 s	Regulated charities	Always subject to EDD
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v	Unregulated charities	EDD on risk-based approach
76 w 76 x	Used Car Dealers Virtual Asset Service Providers	EDD on risk-based approach
76 y	Other (specify)	Do not have this category of customer or industry
77	If restricted, provide details of the restriction	

78 a	If Y indicate who provides the approval:	Both
79	Does the Entity have specific procedures for onboarding	· · · · · · · · · · · · · · · · · · ·
	entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Nc
80	Does the Entity perform an additional control or quality	
	review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section	Yes
81 a	are representative of all the LE's branches If N, clarify which questions the difference/s relate to	
91 <i>a</i>	and the branch/es that this applies to	
82	If appropriate, provide any additional information/context	
	to the answers in this section.	
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83	Does the Entity have risk based policies, procedures and	
	monitoring processes for the identification and raporting 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 monifored manually	·
84 b	If automated or combination selected, are internal	
	system or veridor-sourced tools used?	internal System
84 51	If 'Vendor-sourced tool' or 'Both' selected, what is	
	the name of the vendor/tool?	
24 50	The second secon	
84 b2	When was the tool last updated?	
84 b3	When was the automated Transaction Monitoring application last calibrated?	
85	Does the Entity have regulatory requirements to report	
	suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and	
	processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes	
	to review and escalate matters arising from the	Yes
-	monitoring of customer transactions and activity?	
87	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	Yeş
89	timely manner? Does the Entity have processes in place to send	
	Requests for Information (RFIs) to their customers in a	Yes
	timely manner?	
90	Confirm that all responses provided in the above Section	Yes
90 a	are representative of all the LE's branches If N, clarify which questions the difference/s relate to	
-44	and the branch/es that this applies to	
	and approve to	
	1	
91	If appropriate, provide any additional information/context	
	to the answers in this section.	
Marithmatica		
	NTTRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
	1	

Supplier	
State Local Regulations	(1983 s. 1984)
## 17. specify the regulation Fin. In In In In In In In	
Does the Entity have controls to support the inclusion of required and accurate originator information in cross sources growther intestigues growther intestigues a support the inclusion of required beneficiary information cross-b-order payment makes again and a support the inclusion of required beneficiary information cross-b-order payment makes again and a support to include beneficiary address including country in cross-border Vas beneficiary address including country in cross-border Vas beneficiary address including country in cross-border Vas Section and the branchists and the LE-branches of the support of the branchists and the LE-branches of the support of the branchists and the LE-branches of the branchists and the bra	
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required beneficiary information cross-border payment messages? If Y, does the Entity have procedures to include the control of the control	
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are representative of all the LES 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. 30. SANOTIGHS Does the Entity have a Sanctions Policy approved by management regarding compliance with anotions have applicable to the Entity, Including with respect to its business cenducted with, or through accounts held at foreign financial institutions? By 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 foliciate prohibitions applicable to the rentity foliciate prohibitions applicable to the other entity foliciate prohibitions applicable to the other entity foliciate prohibitions applicable to the other entity accounts or services in a manner causing the other entity foliciate prohibitions applicable to the other entity through opticibitions within the other anily sit local jurisdiction;? 100 Does the Entity have policiae, procedures or other controls reasonably designed to prohibit and/or detect advants taken to evered applicable sanctions prohibitions, associated applicable sanctions prohibitions, associated and the protect of the sanctions are controls reasonably designed to prohibit and/or detect advants taken to evered applicable sanctions prohibitions, associated and the protect of the sanctions are controls reasonably designed to prohibit and/or detect advants taken to evered applicable sanctions prohibitions, associated to accomplicate and the protect of the sanction and the protect of the sanction prohibitions, associated to accomplicate and the protect of the sanctions and	
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10. SANCT GNS 10. Source the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with especto its business cendructed with, or through accounts held at foreign financial institutions? 19. Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity (including prohibitions applicable to the other entity (including prohibitions applicable to the other entity (including prohibitions within the other entity for load jurisdiction?) 100. Does the Entity have policies, procedures or other controls reasonably designed to prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? 101. Does the Entity have policies, procedures or other controls reasonably designed for prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? 102. What is the method used by the Entity (uring orbicating and regularly threrefare apients Senctions (Lists?) 103. Does the Entity acree its customers, including beneficial ownership information collected by the Entity, during orbicating and regularly threrefare apients Senctions (Lists?) 103. What is the method used by the Entity for sanctions selected. 104. What is the method used to or both selected. 105. Lists are used to or or both selected. 106. Source or	• • • • • • • • • • • • • • • • • • • •
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screening? If 'automated' or 'both automated and manual' selected. Are internal system of vendor-sourced tools used? Both ID2 a1	
if 'automated' or 'both automated and manual' selected: 102 a1	
102 a1 Are internal system of vendor-sourced tools used? 102 a1a If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? 102 a2 When did you tast test the effectiveness (of finding true matches) and complateness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110) 103 Does the Entity screen all sanctions relevent data, including at a minimum, entity end location information, contained in cross border transactiens against Sanctions Lists? 104 What is the method used by the Entity? Combination of automated and manual 105 Does the Entity have a data quality management programme to ensura that complete data for all	Fit Marija koj
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including at a minimum, entity end location Information, contained in cross border transactions against Sanctions Lists? 104 What is the method used by the Entity? Combination of automated and manual 105 Does the Entity have a data quality management programme to ensure that complete data for all Yes	
105 Does the Entity have a data quality management programme to ensure that complete data for all Yes	
105 Does the Entity have a data quality management programme to ensura that complete data for all Yes	
transactions are subject to sanctions screening? Select the Sanctions Lists used by the Entity in its sanctions screening processes:	ON THE STATE OF TH
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	n sammeannin sammetika

106 b		
	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	
106 d	European Union Consolidated List (EU)	
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	Itemal lists (including those issued by Ukrainian regulatory Authority)
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?	
109	Confirm that all responses previded in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to end the branch/es that this applies te.	
110	If appropriate, previde any additional information/context to the answers in this section.	
		-
ELECTION .		
	ING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 111 a	Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities	Yes
111 a 111 a 111 b	Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 111 a	Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering,	Yes
111 a 111 a 111 b	Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes Yes
111 a 111 a 111 b 111 c 111 d 111 e	Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significent	Yes Yes Yes
111 a 111 a 111 b 111 c 111 d 111 s 111 f	Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significent regulatory actions or new regulations Conduct and Culture Fraud	Yes Yes Yes Yes
111 a 111 a 111 b 111 c 111 d 111 e 111 f 112	Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significent regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to:	Yes Yes Yes Yes Yes Yes
111 a 111 a 111 b 111 c 111 d 111 d 111 f 111 f 112 a	Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significent regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management	Yes Yes Yes Yes Yes Yes
111 a 111 a 111 b 111 c 111 d 111 e 111 f 112 a 112 b	Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significent regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence	Yes
111 a 111 a 111 b 111 c 111 d 111 e 111 f 112 112 b 112 c	Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significent regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence	Yes Yes Yes Yes Yes Yes Yes
111 a 111 a 111 b 111 c 111 d 111 e 111 f 112 a 112 b 112 c 112 d	Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significent regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence	Yes
111 a 111 a 111 b 111 c 111 c 111 d 111 e 111 f 111 g 112 a 112 b 112 c 112 d 112 e	Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significent regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced	Yes
111 a 111 a 111 b 111 c 111 d 111 e 111 f 112 e 112 c 112 d 112 e 112 f	Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significent regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants)	Yes
111 a 111 a 111 b 111 c 111 d 111 e 111 f 112 a 112 b 112 c 112 d	Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significent regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence Third parties to which specific FCC activities have been outsourced	Yes Yes Yes Yes Yes Yes Yes Yes
111 a 111 a 111 b 111 c 111 d 111 e 111 f 112 e 112 c 112 d 112 c 112 d	Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g., significent regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific reles, responsibilities and high	Yes Yes Yes Yes Yes Yes Yes Yes
111 a 111 a 111 b 111 c 111 d 111 e 111 d 111 e 112 a 112 b 112 c 112 d 112 c 112 f 113	Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significent regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific reles, responsibilities and high risk products, services and activities?	Yes Yes Yes Yes Yes Yes Yes Yes

115 a	If N, clarify which questions the difference/s relate to and the brench/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
42 CHALL	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)?	
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		1 delw spig from a title of the resource programment the state of the control of the control of the control of
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	Component based reviews
123	Does the internal audit function or other independent third	
123 a	party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e	Name Screening & List Management	Yes
123 f 123 g	Reporting/Metrics & Management Information Suspicious Activity Fiting	Yes 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 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. FRAU		
14. FRAL	Does the Entity have policies in place addressing fraud	
128	risk? Does the Entity have a dedicated team responsible for	Yes
	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 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 bo signed by Global Head of Conespondent 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)

__PRAVEX BANK" Joint Stock Company ___(Financial institution name) is fully committed to the fight against financist crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in ell 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 compiles 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 Pinancial Institution commits to file accurate supplemental information on a timely basis.

Gianluca Corrias (CEO), certify that I have got and understood tris, 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 borial of the Financial Institution.

Oleh Yefremov (MLRO or activate in cartify 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 application or handle of the Financial Institution.

I, Oleh Yefremov (MLRO or

ADates Oleh Yefternov