

Financial Institution Name: Location (Country) :

Cornèr Banca S.A. Switzerland

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

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No#	Question	Answer
	& OWNERSHIP	
1	Full Legal Name	
		Cornèr Banca S.A.
		23.16. 24.16. 27.1
2	Append a list of foreign branches which are covered by	
	this questionnaire	Net applicable
		Not applicable
3	Full Legal (Registered) Address	
		NT 0 40 2004 1 0 11 1
		Via Canova 16, 6901 Lugano, Switzerland
4	Full Primary Business Address (if different from above)	
	· · · · · · · · · · · · · · · · · · ·	
		•
5	Date of Entity incorporation/establishment	
· ·	,,,,	
		14.07.1952
6	Select type of ownership and append an ownership chart	
	if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	
		Not applicable
6 b	Member Owned/Mutual	No No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	Confidential Information.
		Please contact bankrelations@corner.ch for more information.
7	% of the Entity's total shares composed of bearer shares	
	·	
		0%
8	Does the Entity, or any of its branches, operate under an	
ŭ	Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which	
	operate under an OBL	
		Not applicable
9	Does the Bank have a Virtual Bank License or provide	no
	services only through online channels?	IIIV
10	Name of primary financial regulator/supervisory authority	
		Swiss Financial Market Supervisory Authority (FINMA)
		Onios i manoia markot ouporvioriy Authority (i mivin)
11	Provide Legal Entity Identifier (LEI) if available	
		9P4\$QVVPT1042\/7EP200
		8B4SQYKBT0O13V7EP290
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	
		Not applicable
13	Jurisdiction of licensing authority and regulator of ultimate	
.•	parent	
	•	Switzerland
14	Select the business areas applicable to the Entity	
14 14 a	Retail Banking	Yes
.7 u	. total balling	1.00

	1	
14 b	Private Banking	Yes
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	No
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	Yes
14 i	Multilateral Development Bank	No
14 j	Wealth Management	Yes
14 k	Other (please explain)	100
		Payment cards issuer
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)	No
15 a	If Y, provide the top five countries where the non- resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	1001-5000
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	No branches
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	
2 PRODU	CTS & SERVICES	
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?	No
19 a1b	provide downstream relationships?	No
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes
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 procedures in place to identify downstream relationships with foreign banks?	Yes
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	No
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	No No
19 a1h2		No
19 a1h3		No
13 a i i i 3	1 01 0	

19 a1i		
	Does the Entity have processes and procedures in	
		Yes
	place to identify downstream relationships with	res
	MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	Yes
19 f	International Cash Letter	Yes
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then	
	offer third party payment services to their customers?	
	offer time party payment services to their editorners:	No
	KY 1 1 1 1 1 0	
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	No
	Virtual Asset Service Providers (VASPs)	
19 i3		No
19 i4	eCommerce Platforms	No
19 i5	Other - Please explain	
1313	Other - Flease explain	
10 i	Private Banking	Both
<u>19 j</u>		
19 k	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	No
	Stored Value Instruments	
19 m		Yes
19 n	Trade Finance	Yes
19 o	Virtual Assets	No .
		TVC
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	
		N-
19 p2	Wire transfers	No
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	Identification and Verification
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.	
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19 g	describing the level of due diligence.	
19 q	describing the level of due diligence. Other high-risk products and services identified by the	
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20 20 a 21 3. AML, CT 22	describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. 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. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise	19a: Correspondent Banking services are offered only and exclusively to the 100% owned affiliate Cornèr Bank (Overseas) Limited, Bahamas, which is subject to Consolidated Supervision by Cornèr Banca SA. Yes
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22		
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,	
23		11-100
	CTF & Sanctions Compliance Department?	
24	Is the Entity's AML, CTF & Sanctions policy approved at	
	least annually by the Board or equivalent Senior	Yes
	Management Committee? If N, describe your practice in	165
	Question 29.	
25	Does the Board receive, assess, and challenge regular	
	reporting on the status of the AML, CTF, & Sanctions	Yes
	programme?	163
26	Does the Entity use third parties to carry out any	No
	components of its AML, CTF & Sanctions programme?	140
26 a	If Y, provide further details	
200	ii i, provido tarinor dotalio	
~=	Door the entitle have a subjettable second in 0	W
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section	No branches
	are representative of all the LE's branches	No bialistics
28 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context	
	to the answers in this section.	
	to the director in this section.	22d: cash reporting is not applicable based on local applicable law
		22d. dddii reperting to not applicable baded on ledal applicable taw
4 ANTI DE	NDERY & CORRUPTION	
	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and	Ven
	requirements to reasonably prevent, detect and report	Yes
	bribery and corruption?	
31	Does the Entity have an enterprise wide programme that	
31		Yes
	sets minimum ABC standards?	
32	Has the Entity appointed a designated officer or officers	
	with sufficient experience/expertise responsible for	Yes
	coordinating the ABC programme?	
33	Does the Entity have adequate staff with appropriate	
••	levels of experience/expertise to implement the ABC	Yes
	programme?	Nist Assituation
34	programme? Is the Entity's ABC programme applicable to:	Not Applicable
34 35	programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that:	Not Applicable
	programme? Is the Entity's ABC programme applicable to:	Not Applicable
35	programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This	Not Applicable
35	programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or	
35	programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	Not Applicable Yes
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35 a 35 b	brogramme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any	Yes
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35 35 a 35 b 35 c 36	programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? 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)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment	Yes Yes Yes Yes Yes Yes
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35 35 a 35 b 35 c 36 37 38 38 a 39 40	Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? 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)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes Yes Yes Yes Yes Yes Yes Yes
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35 35 a 35 b 35 c 36 37 38 38 a 39 40	Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? 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)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and	Yes
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35 35 a 35 b 35 c 36 37 38 38 a 40 40 a 40 b	Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? 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)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
35 35 a 35 b 35 c 36 37 38 38 a 39 40 40 a	Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? 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)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those	Yes
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35 35 a 35 b 35 c 36 37 38 38 a 40 40 a 40 b	Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? 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)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those	Yes
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35 35 a 35 b 35 c 36 37 38 38 a 39 40 40 a 40 b	Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? 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)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes

	T &	
40 e	Changes in business activities that may materially	Yes
	increase the Entity's corruption risk	
41	Does the Entity's internal audit function or other	<u>, </u>
	independent third party cover ABC Policies and	Yes
40	Procedures? Does the Entity provide mandatory ABC training to:	
42	Board and senior Committee Management	Vec
42 a		Yes
42 b	1st Line of Defence 2nd Line of Defence	Yes
42 c		Yes
42 d	3rd Line of Defence	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 (contractors/consultants)	Yes
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches
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.	34: no joint ventures or third parties acting on behalf of the entity
5 AML C	TF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
40	consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent,	
	detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least	Yes
	annually?	Yes
48	Has the Entity chosen to compare its policies and	
	procedures against:	
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	Yes
	fictitious named accounts	
49 b	Prohibit the opening and keeping of accounts for	Yes
40 -	unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide	
49 c	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 311 designated entities	Yes
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
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	
431	issues/potentially suspicious activity identified by	Yes
		ies
	employees	
49 j	Define the process, where appropriate, for terminating	
•	existing customer relationships due to financial crime	Yes
	risk	
40.1		
49 k	Define the process for exiting clients for financial	
	crime reasons that applies across the entity, including	Yes
	foreign branches and affiliates	
49 I	Define the process and controls to identify and handle	
	customers that were previously exited for financial	
		Yes
	crime reasons if they seek to re-establish a	
	relationship	
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	Yes
	"watchlists"	
50	Has the Entity defined a risk tolerance statement or	
	similar document which defines a risk boundary around	Yes
	their business?	
51		
5 1	Does the Entity have record retention procedures that	Yes
	comply with applicable laws?	
51 a	If Y, what is the retention period?	
		5 years or more
52	Confirm that all responses provided in the above Section	I
	are representative of all the LE's branches	No branches
52 a	If N, clarify which questions the difference/s relate to	
52 a		
	and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context	
	to the answers in this section.	
	II	1
6. AMI CT	F & SANCTIONS RISK ASSESSMENT	
	8 SANCTIONS RISK ASSESSMENT	
6. AML, CT	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:	
	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Yes Yes
54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	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	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	Yes Yes
54 a 54 b 54 c 54 d 55 a	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 55 a 55 b	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
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
54 a 54 b 54 c 54 d 55 d 55 a 55 b 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 Transaction Screening Name Screening against Adverse Media/Negative	Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 d 55 a 55 b 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 Name Screening against Adverse Media/Negative News	Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 d 55 a 55 b 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 Name Screening against Adverse Media/Negative	Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 e	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	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 e 55 f 55 g	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	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	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
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 e 55 f 55 g	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 Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	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
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	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 Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	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 Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	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	Yes Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	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	Yes Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	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	Yes Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 555 b 55 c 55 d 55 c 55 f 55 g 56 a	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.	Yes Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	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.	Yes Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a	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.	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a	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. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 c 55 d 55 c 55 f 55 c 55 f 55 g 55 h 56 a	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. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a	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. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g 55 f 56 a 57 a 57 a 57 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 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. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 a 57 a 57 a 57 c 57 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 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. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 f 56 a 57 a 57 a 57 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 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. Does 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
54 a 54 a 54 b 54 c 54 d 55 c 55 a 555 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 a 57 b 57 c 57 d 58	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. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Geography's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 f 55 g 56 a 57 a 57 a 57 c 57 d 58 a	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. Does 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	Yes Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 a 57 a 57 c 57 d 58 a 58 a	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. Does 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 Governance	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 f 55 g 56 a 57 a 57 a 57 c 57 d 58 a	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. Does 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	Yes Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 a 57 a 57 c 57 d 58 a 58 a	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. Does 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 Governance	Yes

58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA	
	was completed.	
	Confirm that all reaponed previded in the above Continu	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches
60 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context	
	to the answers in this section.	
7. KYC. C	DD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	
	CDD must be completed, e.g. at the time of onboarding	Yes
	or within 30 days?	
64	Which of the following does the Entity gather and retain	
	when conducting CDD? Select all that apply:	V
64 a	Customer identification	Yes
64 b	Expected activity Nature of business/employment	
64 c 64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	0%
67	Does the due diligence process result in customers	Von
	receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the	
	customer's risk classification? Select all that apply: Product Usage	V.
67 a1	Geography	Yes
67 a2 67 a3	Business Type/Industry	Yes Yes
67 a3	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	PEP / no PEP
		Contact with BO
		Amount of assets
		Transactions with High Risk countries
68	For high risk non-individual customers, is a site visit a part	•
	of your KYC process?	Yes
68 a	If Y, is this at:	
68 a1	Onboarding	No
68 a2	KYC renewal	No
68 a3	Trigger event	Yes
68 a4	Other	No
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening	,,
	customers for Adverse Media/Negative News?	Yes
60.0	If V is this at:	
69 a	If Y, is this at: Onboarding	Von
69 a1 69 a2	KYC renewal	Yes Yes
03 aZ	IVIO IEIIEWai	100

69 a3		
	Trigger event	Yes
70	What is the method used by the Entity to screen for	Combination of automated and manual
	Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening	
	customers and connected parties to determine whether	
		Yes
	they are PEPs, or controlled by PEPs?	
74 -	If V is this at	
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 and manual
72	Does the Entity have policies, procedures and processes	
73		
	to review and escalate potential matches from screening	l _v
	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)?	
74 a	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	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
74 au	Other (Flease specify)	
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 ade diligence reviews.	
76	From the list below, which categories of customers or	
70	industries are subject to EDD and/or are restricted, or	
	1	
	prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Prohibited
76 b	Respondent Banks	Restricted
76 b1	If EDD or restricted, does the EDD assessment	
7001	contain the elements as set out in the Wolfsberg	Yes
	Correspondent Banking Principles 2022?	100
76 c	Embassies/Consulates	Restricted
76 d	Extractive industries	Restricted
76 e	Gambling customers	Restricted
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
		Prohibited
76 h	MSB/MVTS customers	Prohibited
76 h 76 i		
76 i	MSB/MVTS customers	Prohibited
76 i 76 j	MSB/MVTS customers Non-account customers Non-Government Organisations	Prohibited Prohibited Restricted
76 i 76 j 76 k	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers	Prohibited Prohibited Restricted EDD on risk-based approach
76 i 76 j 76 k 76 l	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power	Prohibited Prohibited Restricted EDD on risk-based approach Prohibited
76 i 76 j 76 k 76 l 76 m	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers	Prohibited Prohibited Restricted EDD on risk-based approach Prohibited Prohibited
76 i 76 j 76 k 76 l 76 m 76 n	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs	Prohibited Prohibited Restricted EDD on risk-based approach Prohibited Prohibited Always subject to EDD
76 i 76 j 76 k 76 l 76 m 76 n 76 o	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates	Prohibited Prohibited Restricted EDD on risk-based approach Prohibited Prohibited Always subject to EDD Always subject to EDD
76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related	Prohibited Prohibited Restricted EDD on risk-based approach Prohibited Prohibited Always subject to EDD Always subject to EDD Always subject to EDD
76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 q	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones	Prohibited Prohibited Restricted EDD on risk-based approach Prohibited Prohibited Prohibited Always subject to EDD Always subject to EDD Always subject to EDD Restricted
76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 r	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment	Prohibited Prohibited Restricted EDD on risk-based approach Prohibited Prohibited Always subject to EDD Always subject to EDD Always subject to EDD Restricted Prohibited
76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 q	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones	Prohibited Prohibited Restricted EDD on risk-based approach Prohibited Prohibited Prohibited Always subject to EDD Always subject to EDD Always subject to EDD Restricted
76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 r	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment	Prohibited Prohibited Restricted EDD on risk-based approach Prohibited Prohibited Always subject to EDD Always subject to EDD Always subject to EDD Restricted Prohibited
76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 r 76 s	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities	Prohibited Prohibited Restricted EDD on risk-based approach Prohibited Prohibited Always subject to EDD Always subject to EDD Always subject to EDD Restricted Prohibited EDD on risk-based approach
76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies	Prohibited Prohibited Restricted EDD on risk-based approach Prohibited Prohibited Always subject to EDD Always subject to EDD Restricted Prohibited Prohibited Prohibited Prohibited Prohibited Prohibited Prohibited
76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 o 76 c 76 q 76 r 76 s 76 t	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities	Prohibited Prohibited Restricted EDD on risk-based approach Prohibited Prohibited Prohibited Always subject to EDD Always subject to EDD Restricted Prohibited Prohibited Newsy subject to EDD Restricted Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited Restricted Restricted
76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers	Prohibited Prohibited Restricted EDD on risk-based approach Prohibited Prohibited Always subject to EDD Always subject to EDD Always subject to EDD Restricted Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited EDD restriction or prohibition Restricted No EDD/restriction or prohibition
76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 c	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEP PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Prohibited Prohibited Restricted EDD on risk-based approach Prohibited Prohibited Prohibited Always subject to EDD Always subject to EDD Restricted Prohibited Prohibited Newsy subject to EDD Restricted Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited Restricted Restricted
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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,	Yes
	accountants, consultants, real estate agents? Does the Entity perform an additional control or quality	
80	review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section	N. I.
	are representative of all the LE's branches	No branches
81 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
82	If appropriate, provide any additional information/context	
	to the answers in this section.	
	ORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting	Yes
	of suspicious activity?	165
84	What is the method used by the Entity to monitor	Automated
	transactions for suspicious activities?	Automateu
84 a	If manual or combination selected, specify what type	
	of transactions are monitored manually	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Both
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is	
04 51	the name of the vendor/tool?	
		Bottomline GT Exchange
84 b2	When was the tool last updated?	<1 year
84 b3	When was the automated Transaction Monitoring	
	application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report	Yes
85 a	suspicious transactions? If Y, does the Entity have policies, procedures and	
00 a	processes to comply with suspicious transaction	Yes
	reporting requirements?	
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	Voo
	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	Yes
	timely manner?	
89	Does the Entity have processes in place to send	V
	Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	No branches
90 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
91	If appropriate, provide any additional information/context	
	to the answers in this section.	
	NT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment	Yes
	Transparency Standards?	

Does the Entity have policies procedures and proposede source control of the policy of			
Series AMI, Law Series	93	Does the Entity have policies, procedures and processes	
93 b Local Regulations 87 c		to comply with and have controls in place to ensure	
Section Sect			
89 Does the Entry house controls to support the inclusion of required and counted entrylegisted information in cross of required and counted in the property of the counted in the co	93 a	FATF Recommendation 16	Yes
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97 If appropriate, provide any additional information/context to the answers in this section. 18. SANCTIONS 19 Note: The propriate provide any additional information/context to the answers in this section. 19 Note: The propriate provide any additional information/context to the answers in this section. 19 Note: The propriate provide any additional information/context to the answers in this section. 19 Note: The propriate provide any additional information/context to the answers in this section. 19 Note: The propriate provide any additional information between applicable to the finity, including with respect to its business conducted with or through accounts held at foreign financial institutions? 19 Does the Entity have policies, procedures, or other controls reasonably designed to provent the use of any propriate according prohibitions, applicable to the cher entity (including prohibitions applicable to the cher entity (including prohibitions) and applicable according and including prohibitions applicable to the cher entity (including prohibitions) and according and including the celebrations and including prohibitions and includ			INO DIRECTION
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[(Ur3i)	100 6		Used for screening customers and beneficial owners and for filtering transactional data
		(Urol)	-

106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Other (specify)	Osed for screening customers and beneficial owners and for filtering transactional data
1061	Oner (specify)	State Secretariat for Economic Affairs (SECO)
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches,	
	subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	
11. TRAINI	NG & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to :	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
112 f	Non-employed workers (contractors/consultants)	Yes
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches

115 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context	
110	to the answers in this section.	
	to the diswell in this section.	
40 01141.17	V ACCUIDANCE (COMPLIANCE TECTING	
	Y ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from	Voc
	the independent Audit function)?	165
118	Does the Entity have a program wide risk based	
	Compliance Testing process (separate from the	Yes
	independent Audit function)?	
119	Confirm that all responses provided in the above Section	No branches
	are representative of all the LE's branches	1.0 5.4.0.00
119 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context	
	to the answers in this section.	
13. AUDIT		
121	In addition to inspections by the government	
	supervisors/regulators, does the Entity have an internal	
	audit function, a testing function or other independent	Yes
	third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular	
	basis?	
122	How often is the Entity audited on its AML, CTF, ABC,	
	Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Yearly
123	Does the internal audit function or other independent third	
	party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and	Yes
100 h	procedures Enterprise Wide Risk Assessment	Yes
123 b 123 c	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	
	tracked to completion and assessed for adequacy and	Yes
12F	completeness? Confirm that all responses provided in the above section	
125	are representative of all the LE's branches	No branches
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	
120	to the answers in this section.	
	to the answers in this section.	
14. FRAU		
127	Does the Entity have policies in place addressing fraud	Yes
128	risk? Does the Entity have a dedicated team responsible for	
120	preventing & detecting fraud?	Yes
	provending a detecting nadd!	1

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	No branches
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	
Declaration Statement		
Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4) Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)		
Cornèr Banca S.A(Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.		
The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.		
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.		
The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.		
The Financial Institution commits to file accurate supplemental information on a timely basis.		
I,Joan Dulsat(Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.		
I,Salvatore Patuto(MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.		
22.01.2024 (Signature & Date)		
22.01.2024 (Signature & Date)		