Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ) V1.4

the Wolfsberg Group

Financial Institution Name: Location (Country) :

ODDO BHF SE Germany

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

No#	Question	Answer
		VIISAGI
1. ENIIIY	& OWNERSHIP	
1	Full Legal Name	
		ODDO BHF SE
2	Append a list of foreign broughes which are severed	
2	Append a list of foreign branches which are covered by this questionnaire	ODDO BHF SE and its branches in Frankfurt, Baden-Baden, Berlin, Bremen, Düsseldorf, Essen,
	by this questionnaire	Hamburg, Hannover, Köln, Mainz, München, Münster, Nürnberg, Rottweil, Siegen, Stuttgart
	[5 1 1 1 1 1 1 1 1 1	
3	Full Legal (Registered) Address	Gallusanlage 8
		60328 Frankfurt/Main (Germany)
		, , , , , ,
	[5 D	
4	Full Primary Business Address (if different from above)	
	above)	
_	Data of Entity in corporation /	
5	Date of Entity incorporation/establishment	01.01.1970
6	Select type of ownership and append an ownership chart if available	
6.0		
6 a 6 a1	Publicly Traded (25% of shares publicly traded) If Y, indicate the exchange traded on and ticker	No
oai	symbol	
	Symbol	
6 b	Member Owned/Mutual	The state of the s
6 c		No .
6 d	Government or State Owned by 25% or more Privately Owned	No Yes
6 d1	If Y, provide details of shareholders or ultimate	Yes
o u i	beneficial owners with a holding of 10% or more	Philippe Oddo
		1 milppe Oddo
7	% of the Entity's total shares composed of bearer	
ľ	shares	0%
	Shares	0 70
8	Does the Entity, or any of its branches, operate under	
ľ	an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es	
	which operate under an OBL	
9	Does the Bank have a Virtual Bank License or	
ľ	provide services only through online channels?	No
10	Name of primary financial regulator/supervisory	
1.	authority	Federal Financial Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht)
	,	Graurheindorfer Straße 108 53117 Bonn
11	Provide Legal Entity Identifier (LEI) if available	
l.,		529900XLAZ15LYK8XK27
12	Provide the full legal name of the ultimate parent /if	
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	ODDO BHF SCA
	dimerent from the Entity completing the DDQ)	

13	Jurisdiction of licensing authority and regulator of	Autorité des Marchés Financiers (AMF), France
	ultimate parent	• •
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	No
14 b	Private Banking	Yes
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	<u> </u>	
	Investment Banking	Yes
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)	
		n/a
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	No
	customers? (Non-resident means customers primarily	No
	resident in a different jurisdiction to the location	
	where bank services are provided)	
15 a	If Y, provide the top five countries where the non-	
13 a	resident customers are located.	
	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	Cicater than \$500 million
''	Section are representative of all the LE's branches.	Yes
47	-	
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.	n/a
	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?	Yes
19 a1b	Does the Entity allow domestic bank clients to	
	provide downstream relationships?	Yes
10.01-		
19 a1c	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	Yes
	domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking	W
	services to foreign banks?	Yes
19 a1e	Does the Entity allow downstream relationships	
	with foreign banks?	Yes
10 216	Does the Entity have processes and procedures	
19 a1f	, , ,	
	in place to identify downstream relationships with	Yes
	foreign banks?	
19 a1g	Does the Entity offer Correspondent Banking	
	services to regulated Money Services Businesses	No
	(MSBs)/Money Value Transfer Services (MVTSs)?	
10 a1b	, , ,	
19 a1h	Does the Entity allow downstream relationships	
	with MSBs, MVTSs, or Payment Service Provider	
<u></u>	(PSPs)?	
19 a1h1	MSBs	No
19 a1h2	MVTSs	No
19 a1h3	PSPs	No
	į ere	1.115

19 a1i	Does the Entity have processes and procedures	
ł	in place to identify downstream relationships with	Yes
ł	MSBs /MVTSs/PSPs?	res
l		
19 b	Cross-Border Bulk Cash Delivery	No
19 с	Cross-Border Remittances	Yes
	I .	
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	Yes
19 f	International Cash Letter	No
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?	No
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	M.
		No
19 i3	Virtual Asset Service Providers (VASPs)	No
19 i4	eCommerce Platforms	No
19 i5	Other - Please explain	
	Carol 1 sacco capitalis	n/a
19 j	Private Banking	Both
19 k		
	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
10 1	0 1 1	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	Please select
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p3	Foreign currency conversion	l No
	. c.c.g carroncy conversion	NO NO
19 p3a	If yes, state the applicable level of due diligence	Please select
19 p3a 19 p4	If yes, state the applicable level of due diligence Sale of Monetary Instruments	Please select No
19 p3a 19 p4 19 p4a	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence	Please select
19 p3a 19 p4	If yes, state the applicable level of due diligence Sale of Monetary Instruments	Please select No
19 p3a 19 p4 19 p4a	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including	Please select No Please select
19 p3a 19 p4 19 p4a 19 p5	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by	Please select No Please select n/a
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19 p3a 19 p4 19 p4a 19 p5 19 q	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to	Please select No Please select n/a n/a
19 p3a 19 p4 19 p4 19 p4a 19 p5 19 q 20 20 a	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. 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.	Please select No Please select n/a n/a Yes
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19 p3a 19 p4 19 p4a 19 p5 19 p5 20 20 a 21 3. AML, CT	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. 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. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	Please select No Please select n/a n/a Yes
19 p3a 19 p4 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C1 22	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. 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. FF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the	Please select No Please select n/a n/a Yes
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19 p3a 19 p4 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C1 22 22 a 22 b 22 c 22 d 22 e 22 f	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. 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 Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	Please select No Please select n/a n/a Yes Yes Yes Yes Yes Yes Yes Ye
19 p3a 19 p4 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C7 22 22 a 22 b 22 c 22 d 22 e	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. 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. If ABANCTIONS 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 Adverse Information Screening Beneficial Ownership Cash Reporting CDD	Please select No Please select n/a n/a Yes Yes Yes Yes Yes Yes Yes Ye
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19 p3a 19 p4 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C7 22 22 a 22 b 22 c 22 c 22 c 22 g 22 h	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. 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. FF & 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 Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review	Please select No Please select n/a n/a Yes Yes Yes Yes Yes Yes Yes Ye
19 p3a 19 p4 19 p4 19 p4a 19 p5 19 q 20 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 i	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. 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. If ABANCTIONS 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 Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review Policies and Procedures	Please select No Please select n/a n/a Yes Yes Yes Yes Yes Yes Yes Ye
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22 m	Suspicious Activity Reporting	Yes
22 m	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	11-100
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Yes
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes
26 a	If Y, provide further details	Some operational Financial Crime tasks are performed by ODDO BHF Solutions AG, wholly-owned subsidiary of ODDO BHF SE.
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	n/a
4. ANTI I	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	Third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
40 с	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Yes
42 f	Non-employed workers as appropriate (contractors/consultants)	Yes
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	n/a
E ABAL C	TE & CANCTIONS DOLLOIS & DROCEDURES	
	CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	
46 b		Yes
	Terrorist financing	
46 c		Yes
46 c 47	Terrorist financing	
	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at	Yes Yes
47	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and	Yes Yes
48	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against:	Yes Yes Yes
47 48 48 a	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards	Yes Yes Yes No
47 48 48 a 48 a1	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes No Not Applicable
47 48 48 a 48 a1 48 b	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards	Yes Yes Yes No Not Applicable Yes
48 48 a 48 a 1 48 b 48 b 1	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes No Not Applicable Yes
48 48 a 48 a 1 48 b 48 b 1 49	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous	Yes Yes Yes No Not Applicable Yes Yes
48 a 48 a 48 a 1 48 b 48 b 1 49 49 a	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for	Yes Yes Yes No Not Applicable Yes Yes Yes
48 48 a 48 a1 48 b1 48 b1 49 a 49 b	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide	Yes Yes Yes No Not Applicable Yes Yes Yes Yes Yes
48 48 a 48 a 1 48 b 48 b 1 49 a 49 b 49 c	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes Yes Yes No Not Applicable Yes Yes Yes
48 48 a 48 a 1 48 b 48 b 1 49 a 49 b 49 c 49 d	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides	Yes Yes Yes No Not Applicable Yes Yes Yes Yes Yes Yes
48 48 a 48 a 1 48 b 48 b 49 a 49 b 49 c 49 d 49 e	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for	Yes Yes Yes No Not Applicable Yes Yes Yes Yes Yes Yes Yes Yes
48 48 a 48 a 1 48 b 48 b 1 49 a 49 a 49 c 49 d 49 e 49 f	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de	Yes Yes Yes No Not Applicable Yes Yes Yes Yes Yes Yes Yes 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 appropriate, for terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial 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 all responses provided in the above Section are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context to the answers in this section.	
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6 AMI CTI	E & SANCTIONS DISK ASSESSMENT	
6. AML, CTI	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes Voc
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Yes
54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	
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 a 54 b 54 c 54 d 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	Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 d 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
54 a 54 b 54 c 54 d 55 d 55 a 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 PEP Identification	Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 d 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
54 a 54 b 54 c 54 d 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
54 a 54 b 54 c 54 d 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	Yes Yes Yes Yes Yes Yes Yes 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	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 a 54 b 54 c 54 d 55 55 a 55 a 55 c 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 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 c 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	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	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
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 d 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 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 d 55 c 55 d 55 f 56 a 56 a 57 b 57 a 57 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 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 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 d 55 f 56 a 57 c 57 a 57 c 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 b 54 c 54 d 55 5 5 a 55 b 55 c 55 d 55 c 55 d 55 6 55 d 55 f 55 f 55 f 56 a 57 a 57 b 57 c 57 d 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 b 54 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 f 55 g 55 h 56 a 57 b 57 c 57 d 58 b 57 c 57 d 58 b 57 c 57 d 58 b 58 c 58 d 59 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 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
54 a 54 a 54 b 54 c 54 c 55 d 55 a 55 a 55 b 55 c 55 d 55 c 55 d 55 6 55 a 55 f 55 g 55 h 56 57 a 57 a 57 a 57 a 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 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 5	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 Yes
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88 g Transaction Screening Yes 99 a Has the Entity's Sanctions (NWA been completed in the last 12 months?) 90 a If N, provide the date when the last Sanctions EVNA was completed. 90 a If N, provide the date when the last Sanctions EVNA was completed. 91 and the Sanction Sa	F0 -	Name Caracaria	lv.
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68 a1 Onboarding Yes 68 a2 KYC renewal No 68 a3 Trigger event No 68 a4 Other Yes 68 a4 If yes, please specify "Other" The relationship manager visit their clients regularly every one or two years throughout the entire business relationship. 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 69 a If Y, is this at: 69 a1 Onboarding Yes		1	163
68 a2 KYC renewal No 68 a3 Trigger event No 68 a4 Other Yes 68 a4a If yes, please specify "Other" The relationship manager visit their clients regularly every one or two years throughout the entire business relationship. 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 69 a If Y, is this at: 69 a1 Onboarding Yes	68 a		
Trigger event No No Other Yes The relationship manager visit their clients regularly every one or two years throughout the entire business relationship. Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? If y, is this at: Onboarding Yes	68 a1	· ·	Yes
68 a4 Other Yes 68 a4a If yes, please specify "Other" Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? Fig. 1 Yes Yes Yes Yes	68 a2	KYC renewal	No
68 a4 Other Yes 68 a4a If yes, please specify "Other" The relationship manager visit their clients regularly every one or two years throughout the entire business relationship. 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 69 a If Y, is this at: 69 a1 Onboarding Yes	68 a3	Trigger event	No
If yes, please specify "Other" The relationship manager visit their clients regularly every one or two years throughout the entire business relationship. Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? If Y, is this at: Onboarding Yes	68 a4	Other	
business relationship. Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? If Y, is this at: Onboarding Yes	68 a4a	If yes, please specify "Other"	
Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 1			
screening customers for Adverse Media/Negative News? 69 a If Y, is this at: 69 a1 Onboarding Yes			
screening customers for Adverse Media/Negative News? 69 a If Y, is this at: 69 a1 Onboarding Yes			
screening customers for Adverse Media/Negative News? 69 a If Y, is this at: 69 a1 Onboarding Yes	69	Does the Entity have a risk based approach to	
News? 69 a If Y, is this at: 69 a1 Yes			Yes
69 a If Y, is this at: Yes Yes			163
69 a1 Onboarding Yes	60 2		
V 1-2			V
NIC Tellewall Yes			
	บษ ล∠	NTO renewar	res

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	
	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 they are PEPs, or controlled by PEPs?	
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
73	What is the method used by the Entity to screen PEPs? Does the Entity have policies, procedures and processes	Combination of automated and manual
73	to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1 74 a2	Less than one year	No
74 a2	1 – 2 years 3 – 4 years	Yes No
74 a4	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	n/a
		IVA
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	EDD on risk-based approach
76 b	Respondent Banks	EDD on risk-based approach
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	EDD on risk-based approach
76 e	Gambling customers	EDD on risk-based approach
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Restricted
76 h	MSB/MVTS customers	Prohibited
76 i	Non-account customers	EDD on risk-based approach
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	Restricted
76 I	Nuclear power	Restricted
76 m	Payment Service Providers	Prohibited
76 n	PEPs	Always subject to EDD
76 o	PEP Close Associates	Always subject to EDD
76 p	PEP Related	Always subject to EDD
76 q	Precious metals and stones	EDD on risk-based approach
76 r	Red light businesses/Adult entertainment	EDD on risk-based approach
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v	Unregulated charities	Restricted
76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers	Restricted
76 y	Other (specify)	among others: Companies which conduct their business mainly on a cash basis (i.e. restaurants, car dealers, art and antiques dealers), gold/ gemstone dealers, professional athletes (only natural person), scrap dealer/ waste collection, companies with reference to luxury yachts, real estate companies
77	If restricted, provide details of the restriction	Client acceptance only after approval of client acceptance comittee (including the responsible board member). Transactions monitoring by business unit and Compliance on a risk-based approach. Monitoring frequency depends on respective risk category, i.e. annually, twice a year, permanently.
78	Does EDD require senior business management and/ or compliance approval?	Yes

70 -	If V indicate who persides the second	D. dt.
78 a 79	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?	Yes
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
82	If appropriate, provide any additional information/context to the answers in this section.	n/a
8. MONITO	PRING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Automated
84 a	If manual or combination selected, specify what type of transactions are monitored manually	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Vendor-sourced tools
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	SMARAGD
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	<1 year
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
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 timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	n/a
9 PAYMEN	NT TRANSPARENCY	
9. PAYMEN	IT TRANSPARENCY Does the Entity adhere to the Wolfsberg Group	Yes

-	To a said the said th	
93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Voo
93 b		Yes
	Local Regulations	Yes
93 b1	If Y, specify the regulation	REGULATION (EU) 2023/1113 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 31 May 2023 on information accompanying transfers of fund and certain crypto-assets and amending Directive (EU) 2015/849
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	n/a
10. SANO	CTIONS	
98	Does the Entity have a Sanctions Policy approved by	
	management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Automated
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	SMARAGD
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	1-2 years
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Combination of automated and manual
		

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	Internal Deny lists, Worldcheck/ Factiva
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 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.	n/a
	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 112 c	1st Line of Defence 2nd Line of Defence	Yes
112 c 112 d	2nd Line of Defence 3rd Line of Defence	Yes
112 d 112 e	Third parties to which specific FCC activities have	Yes Yes
112 f	been outsourced 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?	
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Every Two Years
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
	Coolion are representative of all the LL's brailches	

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 to the answers in this section.	n/a
40.01141.17		
12. QUALITY 117	ASSURANCE /COMPLIANCE TESTING Does the Entity have a program wide risk based	
	Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	The Quality Assurance program covers key processes to manage Financial Crime Risks (KYC/ Know-your-Customer, NLS/ Name list screening, TF & TM).
13. AUDIT	<u></u>	
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Yearly
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c 123 d	Governance KYC/CDD/EDD and underlying methodologies	Yes Yes
123 u	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k 123 l	Training & Education Other (specify)	Yes n/a
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.	n/a
14. FRAUC		
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes

129 Does the Entity have real time monitoring to detect fraud? Yes	
additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID? 131 Confirm that all responses provided in the above	
Voo	
131 a 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.	
<u>Declaration Statement</u>	
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 Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent) ODDO BHF SE (Financial Institution name) is fully committed to the fight against financial crime and makes	, Global Head of
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 reputati legal and regulatory obligations.	on and to meet its
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed transactions.	adopting these
The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade F The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.	inance Principles.
The Financial Institution commits to file accurate supplemental information on a timely basis.	
, Sebastian Wald (Global Head of Correspondent Banking or equivalent), certify that I have read and understood 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 Institution.	
, Jennifer Sander (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.	
i, (MENO of equivalent), certify that Thave read and differentiation decidation, that the answers	
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. 27.10.2025	