	the	
	Wolfsberg	
	Group ————————————————————————————————————	
	Financial Institution Name:	Taiwan Cooperative Bank, Ltd.
	Location (Country):	Taiwan,R.O,C
are materially s response for th	imilar to the LE Head Office. This questionnaire should not cover more than	tution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model 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 regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially such.
No#	Question	Answer
	& OWNERSHIP	
1	Full Legal Name	
		Taiwan Cooperative Bank, Ltd.
2	Append a list of foreign branches which are covered by this questionnaire	Please refer to below-mentioned link for our domestic and overseas units: https://www.tcb-bank.com.tw/eng/Locations/Pages/branches_location_eng.aspx https://www.tcb-bank.com.tw/eng/Locations/Pages/oversea_location_eng.aspx
3	Full Legal (Registered) Address	No.225, Sec. 2, Chang'an E, Rd., Songshan Dist., Taipei City 105, Taiwan(R.O.C.)
4	Full Primary Business Address (if different from above)	same as above
5	Date of Entity incorporation/establishment	1946/10/5
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	Taiwan Cooperative Bank is a wholly owned subsidiary of Taiwan Cooperative Financial Holding Co., Ltd., which is listed on Taiwan Stock Exchange with ticker symbol of "TWSE:5880"
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	Yes
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	0%
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	Yes
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	Offshore Banking Branch, Manila Offshore Banking Branch.
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	no
10	Name of primary financial regulator/supervisory authority	Financial Supervisory Commission R.O.C (Taiwan)
11	Provide Legal Entity Identifier (LEI) if available	

Taiwan Cooperative Financial Holding Co., Ltd.

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Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)

19 a1h2 19 a1h3	MVTSs PSPs	
19 alh1	MVTSs	
19 a1h1	with MSBs, MVTSs, or Payment Service Provider MSBs	
19 a1h	Does the Entity allow downstream relationships	
	(MSBs)/Money Value Transfer Services (MVTSs)?	
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	
	foreign banks?	
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with	
19 ale	Does the Entity allow downstream relationships with foreign banks?	
	services to foreign banks?	
19 a1d	place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking	
19 a1c	provide downstream relationships? Does the Entity have processes and procedures in	
19 a1b	services to domestic banks? Does the Entity allow domestic bank clients to	
19 ala	Does the Entity offer Correspondent Banking	
19 a 19 a1	If Y	No
19 19 a	Does the Entity offer the following products and Correspondent Banking	
	JCTS & SERVICES	
2 0000	ICTS 9, SEDVICES	
18	If appropriate, provide any additional information/context to the answers in this section.	
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	Section are representative of all the LE's branches.	Yes
16 b 17	Total Assets Confirm that all responses provided in the above	Greater than \$500 million
16 a	Number of employees	5001-10000
16	Select the closest value:	
15 a	bank services are provided) If Y, provide the top five countries where the non- resident customers are located.	
	more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where	No
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive	
14 j 14 k	Wealth Management Other (please explain)	Yes
14 i	Multilateral Development Bank	No
14 ĥ	Broker/Dealer	Dealer : Yes
14 g	Securities Services/Custody	Yes
14 f	Financial Markets Trading	Yes
14 e	Investment Banking	No No
14 d	Transactional Banking	Yes
14 b	Commercial Banking	Yes Yes
14 a 14 b	Private Banking	Yes
14	Select the business areas applicable to the Entity Retail Banking	V0.
		the state of the s
	ultimate parent	Financial Supervisory Commission R ₂ O ₂ C (Taiwan)

10 1	T B	
19 a1i	Does the Entity have processes and procedures in	
	place to identify downstream relationships with	
	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	No
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?	Yes
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	Yes
19 i3	Virtual Asset Service Providers (VASPs)	No
19 i4	eCommerce Platforms	Yes
19 i5	Other - Please explain	163
	Strict Trease explain	
19 j	Private Banking	Domestic
19 k	Remote Deposit Capture (RDC)	No
191	Sponsoring Private ATMs	No No
19 m	Stored Value Instruments	
		No
19 n	Trade Finance	Yes
19 o	Virtual Assets	No.
19 p	For each of the following please state whether you	
	offer the service to walk-in customers and if so, the	
	applicable level of due diligence:	
19 p1	Check cashing service	Yes
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	Yes
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	Yes
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	
19 p5	If you offer other services to walk-in customers	
	please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches.	Yes
20 a	If N, clarify which questions the difference/s relate to	
-54	and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	
	information/context to the answers in this section.	•
3 AMI C		
	TF & SANCTIONS PROGRAMME	
3. AML, C 22	TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the	
22	TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 22 a	TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient	Yes
22 a 22 b	TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening	Yes Yes
22 a 22 b 22 c	TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership	Yes Yes Yes
22 a 22 b 22 c 22 d	TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting	Yes Yes Yes Yes
22 a 22 b 22 c 22 d 22 e	TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting	Yes Yes Yes
22 a 22 b 22 c 22 d 22 e 22 f	TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse information Screening Beneficial Ownership Cash Reporting CDD	Yes Yes Yes Yes
22 a 22 b 22 c 22 d 22 e 22 f	TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	Yes Yes Yes Yes Yes
22 a 22 b 22 c 22 d 22 e 22 f 22 g	TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Yes Yes Yes Yes Yes Yes Yes Yes Yes
22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Yes
22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 h	TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes
22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 p 22 p	TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Yes
22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 h	TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment	Yes

22 m	Suspicious Activity Papartina	TVAS
22 m	Suspicious Activity Reporting Training and Education	Yes
22 0	Transaction Monitoring	Yes Yes
23	How many full time employees are in the Entity's AML,	11-100
24	CTF & Sanctions Compliance Department? Is the Entity's AML, CTF & Sanctions policy approved at	
-	least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Ouestion 29.	Yes
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	
202	in 1, provide faither details	
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above	Yes
70 -	Section are representative of all the LE's branches	
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	
4. ANTI B	RIBERY & 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	
22	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:	Not Applicable
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 c	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	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	No
40 b	Corruption risks associated with the countries and	No

40 c		
400	Transactions, products or services, including those	
	that involve state-owned or state-controlled entities	Yes
	or public officials	
40 d	Corruption risks associated with gifts and hospitality,	
	hiring/internships, charitable donations and political	Yes
	contributions	150
40 -	Characteristics and the charac	
40 e	Changes in business activities that may materially	No
	increase the Entity's corruption risk	
41	Does the Entity's internal audit function or other	
	independent third party cover ABC Policies and	Yes
	Procedures?	
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	New Applicability
	subject to ABC risk have been outsourced	Not Applicable
42 f	Non-employed workers as appropriate	
	(contractors/consultants)	Not Applicable
43	Does the Entity provide ABC training that is targeted to	
75		Yes
4.4	specific roles, responsibilities and activities?	
44	Confirm that all responses provided in the above	Yes
	Section are representative of all the LE's branches	
44 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
		I I
45	If appropriate, provide any additional	
	information/context to the answers in this section.	
5. AML,	CTF & SANCTIONS POLICIES & PROCEDURES	
5. AML, 46	CTF & SANCTIONS POLICIES & PROCEDURES Has the Entity documented policies and procedures	
	Has the Entity documented policies and procedures	
	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions	
	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent,	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 46 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering	Yes
46 a 46 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing	Yes
46 a 46 b 46 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations	Yes Yes
46 a 46 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing	Yes Yes
46 a 46 b 46 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations	Yes Yes
46 a 46 b 46 c 47	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually?	Yes Yes
46 a 46 b 46 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering 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
46 a 46 b 46 c 47	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering 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
46 a 46 b 46 c 47 48 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering 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 Yes
46 a 46 b 46 c 47 48 48 a 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering 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 Yes Yes Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 a1 48 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering 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 Yes
46 a 46 b 46 c 47 48 a 48 a 48 a 1 48 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering 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 Yes Yes Yes
46 a 46 b 46 c 47 48 a 48 a 48 a 1 48 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering 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 Yes Yes Yes Yes Yes Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b 49	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering 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:	Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b 49	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering 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	Yes Yes Yes Yes Yes Yes Yes Yes Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering 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	Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering 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	Yes
46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b 49 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering 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	Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering 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	Yes Yes Yes Yes Yes Yes Yes Yes Yes
46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 49 b 49 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering 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	Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 b 49 b 49 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering 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	Yes
46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 49 b 49 c 49 d	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering 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 accounts/relationships with shell banks	Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 49 b 49 c 49 d	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering 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? Pooes the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides	Yes
46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 a 49 b 49 a 49 c 49 d 49 e	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering 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 accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks	Yes Yes
46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 a 49 b 49 c 49 c 49 d 49 e	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering 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	Yes Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 49 b 49 c 49 d 49 e	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering 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	Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 49 b 49 c 49 d 49 e	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering 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 accounts/relationships with shell 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 any of	Yes Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 49 b 49 c 49 d 49 e	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering 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 accounts/relationships with shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents,	Yes Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 49 b 49 c 49 d 49 e	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering 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 accounts/relationships with shell 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 any of	Yes Yes
46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 49 b 49 c 49 d 49 e	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering 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? Pooes 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 other 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 any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de	Yes Yes
46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 a 49 b 49 c 49 d 49 e 49 f 49 g	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering 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 dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell 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 any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes Yes
46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 49 b 49 c 49 d 49 e 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering 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? Pooes 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 other 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 any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de	Yes Yes

49 i		
491	Define the process for escalating financial crime risk	
	issues/potentially suspicious activity identified by	Yes
	employees	
49 j	Define the process, where appropriate, for	
491		Yes
10.1	terminating existing customer relationships due to	
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	Yes
l		Tes
	financial crime reasons if they seek to re-establish a	
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	
4311		Yes
	"watchlists"	
50	Has the Entity defined a risk tolerance statement or	
	similar document which defines a risk boundary around	Yes
	their business?	·
51	Does the Entity have record retention procedures that	
	somely with applicable laws?	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	Voc
	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.	
	and the branchyes that this applies to.	
E 2	If appropriate arounds any additional	
53	If appropriate, provide any additional	
53	If appropriate, provide any additional information/context to the answers in this section.	
53		
53		
	information/context to the answers in this section.	
	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT	
6. AML, C	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT	
	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent	
6. AML, C	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
6. AML, C 54 54 a	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes
6. AML, C 54 54 a 54 b	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Yes Yes
6. AML, C 54 54 a	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	
6. AML, C 54 54 a 54 b	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
6. AML, C 54 54 a 54 b 54 c	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls	Yes Yes
6: AML , C 54 54 a 54 b 54 c 54 d 55	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes Yes
6: AML , C 54 54 a 54 b 54 c 54 d 55	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes Yes Yes Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 55 a 55 b 55 c	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes Yes Yes Yes Yes Yes Yes Yes Yes
6, AML, C 54 54 a 54 b 54 c 54 d 55 55 55 a 55 b 55 c	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 c 55 c	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 c	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative Training and Education Governance	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 c 55 a 55 c 55 d 55 c 55 f 55 f	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative Training and Education Governance Management Information	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 c	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in	Yes
6, AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 f	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 c 55 a 55 c 55 d 55 c 55 f 55 f	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in	Yes
6, AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 f	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
6, AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 f	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative 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
6, AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 f	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative 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
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 b 55 c 55 d 55 c 55 d 55 f 55 f 55 f 55 f 55 a	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative 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
6, AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 f	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative 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
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 b 55 c 55 d 55 c 55 d 55 f 55 f 55 f 55 f 55 a	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative 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
6. AML, C 54 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	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative 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:	Yes
6, AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 s 55 h 56 a	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative 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
6, AML, C 54 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	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative 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
6. AML, C 54 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative 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
6. AML, C 54 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative 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
6. AML, C 54 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 56 a	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative 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
6. AML, C 54 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative 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
6. AML, C 54 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 56 a 57 57 a 57 b 57 c 57 d 58	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative 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
6. AML, C 54 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 a 57 57 a 57 a 57 d 58 58 a	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative 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
6. AML, C 54 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 56 a 57 57 a 57 b 57 c 57 d 58	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative 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
6. AML, C 54 54 a 54 b 54 c 54 d 55 5 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 57 a 57 a 57 d 58 58 a 58 b	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative 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
6. AML, C 54 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 a 57 57 a 57 a 57 d 58 58 a	information/context to the answers in this section. TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative 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 List Management	Yes

E0.c	Name Screening	Voc
58 e 58 f	Name Screening Transaction Screening	Yes Yes
58 q	Training and Education	Yes
59 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.	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context to the answers in this section.	
7. KYC, CD	DD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d 64 e	Ownership structure Product usage	Yes Yes
64 f	Purpose and nature of relationship	Yes
64 q	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	0411 - 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
65 a	Ultimate beneficial ownership	Yes
65 a1 65 b	Are ultimate beneficial owners verified? Authorised signatories (where applicable)	Yes Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	25%
67	Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the	Yes
67 a	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5 67 a6	Adverse Information Other (specify)	Yes
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	Yes
68 a2 68 a3	KYC renewal Trigger event	Yes Yes
68 a4	Other	Yes 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
69 a	If Y, is this at:	Voc
69 a1 69 a2	Onboarding KYC renewal	Yes Yes
U3 aZ	NTCTETIEWai	163

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	162
, 0	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?	
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
73	Does the Entity have policies, procedures and processes	
	to review and escalate potential matches from	
	screening customers and connected parties to	Yes
	determine whether they are PEPs, or controlled by	
74	Is KYC renewed at defined frequencies based on risk	Yes
	rating (Periodic Reviews)?	Tes
74 a	If yes, select all that apply:	
74 a1	Less than one year	
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)	
	1	
	4	
75	Does the Entity maintain and report metrics on current	Yes
	and past periodic or trigger event due diligence	Tes .
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	ess of first based approach
	contain the elements as set out in the Wolfsberg	Yes
	Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	EDD on risk-based approach
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	EDD on risk-based approach
76 i	Non-account customers	EDD on risk-based approach
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	EDD on risk-based approach
761	Nuclear power	EDD on risk-based approach
76 m	Payment Service Providers	EDD on risk-based approach
76 n	PEPs	EDD on risk-based approach
76 o	PEP Close Associates	EDD on risk-based approach
76 p	PEP Related	EDD on risk-based approach
76 q	Precious metals and stones	EDD on risk-based approach
76 r	Red light businesses/Adult entertainment	Red light business: Prohibited/Adult entertainment: EDD on a risk based approach
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited
76 u		EDD on risk-based approach
76 v	Unregulated charities	Prohibited
76 w		EDD on risk-based approach
76 x		Restricted
76 y	Other (specify)	
,	, , ,	
77	If rostricted provide details of the sectionic	
′ ′	If restricted, provide details of the restriction	
		The account opening application of Virtual Asset Service Provider (VASP) can be declined since March 1,2024.
		the second control of
		When performing customer due diligence or monitoring transactions on existing customers, our bank should
		identify whether existing customers are VASP. If existing customers are VASP, our bank will take control
		when performing customer due diligence or monitoring transactions on existing customers, our bank should identify whether existing customers are VASP. If existing customers are VASP, our bank will take control measures to mitigate risk.
		identify whether existing customers are VASP. If existing customers are VASP, our bank will take control
78	Does FDD require senior business management and/or.	identify whether existing customers are VASP. If existing customers are VASP, our bank will take control

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?	
80	Does the Entity perform an additional control or quality	Yes
01	review on clients subject to EDD? Confirm that all responses provided in the above	
81	Section are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
82	If appropriate, provide any additional	
	information/context to the answers in this section.	
8 MONITO	DRING & 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?	Combination of automated and manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	For the manual transaction monitoring, if a customer is detected with suspicious activities with our over-the counter AML/CFT checklist (eg. Customer frequently exchanges small-denomination notes for those of large-denomination, or vice versa.) .
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?	SAS
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	Vac
	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.	
9. PAYMEN	NT TRANSPARENCY	two in angle militure with the second first reference in the expression in the expression in the second in the sec
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes

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	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	(Paradatas Causal Allina Allin
		(Regulations Governing Anti-Money Laundering of Financial Institutions), (Directions Governing Banking Enterprises for Operating Foreign Exchange Business)
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?	
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	Yes
96 a	Section are representative of all the LE's branches	1027
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.	
10. SANC		
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		
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?	Both Automated and Manual
102 a	If 'automated' or 'both automated and manual'	
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?	SAS
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 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions	Yes
704	What is the method used by the Entity?	Combination of automated and manual
104		
104	Does the Entity have a data quality management	

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	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)	
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	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.	
	NG & EDUCATION	
111	NG & EDUCATION Does the Entity provide mandatory training, which includes:	
111 111 a	NG & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities	Yes
111 111 a	NG & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to	Yes Yes
111 111 a 111 b	NG & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering,	
111 a 111 a 111 b	NG & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant	Yes
111 a 111 a 111 b 111 c	Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes Yes
111 a 111 a 111 b 111 c 111 d 111 e	NG & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to qovernment authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes Yes Yes
111 a 111 a 111 b 111 c 111 d 111 e 111 f	NG & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to qovernment authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture	Yes Yes Yes Yes
111 a 111 a 111 b 111 c 111 d 111 e 111 f 112	ING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud	Yes Yes Yes Yes
111 a 111 a 111 b 111 c 111 d 111 e 111 f 112 112 a	NG & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management	Yes Yes Yes Yes Yes Yes Yes Yes
111 a 111 a 111 b 111 c 111 d 111 e 111 f 112 112 a 112 b	NG & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to qovernment authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence	Yes Yes Yes Yes Yes Yes Yes Yes Yes
111 a 111 a 111 b 111 c 111 d 111 e 111 f 112 a 112 b 112 c	NG & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to qovernment authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence	Yes
111 a 111 a 111 b 111 c 111 d 111 e 111 f 112 112 a 112 b 112 c 112 d	NG & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have	Yes Yes Yes Yes Yes Yes Yes Yes Yes
111 a 111 a 111 b 111 c 111 d 111 e 111 f 112 112 a 112 b 112 c 112 d 112 e	NG & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence Third parties to which specific FCC activities have been outsourced	Yes
111 a 111 a 111 b 111 c 111 d 111 e 111 f 112 a 112 b 112 c 112 d 112 c 112 f	NG & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to qovernment authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and	Yes
111 a 111 a 111 b 111 c 111 d 111 e 111 f 112 112 a 112 b 112 c 112 d 112 e 112 f 113	NG & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to qovernment authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
111 a 111 a 111 b 111 c 111 d 111 e 111 f 112 a 112 b 112 c 112 d 112 c 112 d 113	NG & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to qovernment authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes Yes Yes Yes Yes Yes Yes Yes
111 a 111 a 111 b 111 c 111 d 111 e 111 f 112 a 112 a 112 b 112 c 112 d 112 c 112 d 112 e	NG & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to qovernment authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities? Does the Entity provide customised training for AML, CTF and Sanctions staff? If Y, how frequently is training delivered?	Yes

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.	
12. QUALIT	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality	
	Assurance programme for financial crime (separate	Yes
110	from the Independent Audit function)?	
118	Does the Entity have a program wide risk based	
	Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above	
1113	Section are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
120	If appropriate, provide any additional	
	information/context to the answers in this section.	
13. AUDIT		
121	In addition to inspections by the government	
	supervisors/regulators, does the Entity have an internal	
	audit function, a testing function or other independent	V .
	third party, or both, that assesses FCC AML, CTF, ABC,	Yes
	Fraud and Sanctions policies and practices on a regular	
	basis?	
122	How often is the Entity audited on its AML, CTF, ABC,	
100	Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b 123	External Third Party	Yearly
123	Does the internal audit function or other independent third party cover the following areas:	
	trilla party cover the following areas:	
123 a	AMI_CTE_ABC_Eraud and Sanctions policy and	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and	Yes
123 a 123 b	AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment	
	procedures	Yes
123 b	procedures Enterprise Wide Risk Assessment	
123 b 123 c 123 d 123 e	procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management	Yes Yes
123 b 123 c 123 d 123 e 123 f	procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information	Yes Yes Yes
123 b 123 c 123 d 123 e 123 f 123 g	procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing	Yes Yes Yes Yes Yes Yes Yes Yes
123 b 123 c 123 d 123 e 123 f 123 g 123 h	procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology	Yes Yes Yes Yes Yes Yes Yes Yes Yes
123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i	procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring	Yes
123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j	procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions	Yes
123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k	procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education	Yes
123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j	procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions	Yes
123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k	procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education	Yes
123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k	procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education	Yes
123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k 123 l	procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify)	Yes
123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k	procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit	Yes
123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k 123 l	procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and	Yes
123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k 123 l	procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k 123 l	procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filling Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above	Yes
123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k 123 l	procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 j 123 k 123 l	procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 j 123 k 123 l	procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to	Yes
123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 j 123 k 123 l	procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to	Yes
123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 j 123 k 123 l	procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Yes
123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k 123 l	procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to	Yes
123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k 123 l	procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Yes
123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k 123 l	procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Yes
123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 j 123 k 123 l 125 a	procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Yes
123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k 123 l 125 a	Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Yes
123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 j 123 k 123 l 124 125 125 a	procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Yes
123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k 123 l 125 a	Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Yes

129	Does the Entity have real time monitoring to detect	Yes
130	Do the Entity's processes include gathering additional	
	information to support its fraud controls, for example: IP	Yes
	address, GPS location, and/or device ID?	
131	Confirm that all responses provided in the above	Yes
	section are representative of all the LE's branches	
131 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	v v
		**
132	If appropriate, provide any additional	
	information/context to the answers in this section.	
Doelarat	ion Statement	
<u>Jecial at</u>	ion statement	
Malfchara	Group Correspondent Banking Due Diligence Questionnaire 2023	(CPDDOVIA)
		ring 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) Taiwan Cooperative Bank, Ltd _(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. (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Lin, Yueh-Ching 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. (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and Wu.Shu-Lina correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution. May 8 2025 (Signature & Date)

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