the Wolfsberg Group

Financial Institution Name: Location (Country) :

BANCA DI CIVIDALE SPA ITALY

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

No #	terially different than its Entity Head Office, a separate questionnaire can Question	Answer
	& OWNERSHIP	Augwei
1. ENTITE	Full Legal Name	
•	l un Legar Name	
		BANCA DI CIVIDALE SPA
2	Append a list of foreign branches which are covered by	
	this questionnaire	
		NO FOREIGN BRANCHES
3	Full Legal (Registered) Address	
		VIA SENATORE GUGLIELMO PELIZZO 8-1 - CIVIDALE DEL FRIULI (UDINE -ITALY) 33043
		VIA SENATORE GOGLIELINO PELIZZO 6-1 - CIVIDALE DEL FRIOLI (ODINE -ITALT) 33043
-		
4	Full Primary Business Address (if different from above)	
	D-4	
5	Date of Entity incorporation/establishment	
		22.07.1886
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	Vorvel - ISIN IT0001014783
		VOIVEL - ISIN 11000 10 147 03
6 b	Member Owned/Mutual Government or State Owned by 25% or more	No No
6 c 6 d	Privately Owned	No Yes
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	Cassa di Risparmio di Bolzano S.p.A. (79,1%), a subsidiary of the Fondazione Cassa di Risparmio - Stifung
		Südtiroler Sparkasse (foundation) (62,66%). We confirm that no natural person controls or owns directly and/or indirectly 10% or more of the entity's shares.
		we commit that no natural person controls of owns directly and/or indirectly 10 % of more of the entity's shares.
7	% of the Entity's total shares composed of bearer shares	
		None
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which	
	operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide	no
40	services only through online channels?	
10	Name of primary financial regulator/supervisory authority	
		BANCA D'ITALIA
11	Provide Legal Entity Identifier (LEI) if available	
	, , , , , , , , , , , , , , , , , , , ,	
		54930OBOFLNFTFYQDJ30
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	Cassa di Pisnarmio di Bolzano S.n.A. (70.19/.)
		Cassa di Risparmio di Bolzano S.p.A. (79,1%)
13	Jurisdiction of licensing authority and regulator of ultimate	
	parent	ITALY
		···· - ·
	Coloret the housing age of the colorest to the	
14	Select the business areas applicable to the Entity Retail Banking	Yes
14 a 14 b	Private Banking	Yes

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

19 a1i	Does the Entity have processes and procedures in	
•	place to identify downstream relationships with	
	MSBs /MVTSs/PSPs?	
40 h		No
19 b	Cross-Border Bulk Cash Delivery	
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No
19 f	International Cash Letter	No
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then	
	offer third party payment services to their customers?	No.
	1 ,1 ,	140
19 i1	If Y , please select all that apply below?	
19 i2	Third Party Payment Service Providers	
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	
19 j	Private Banking	Domestic
19 k	Remote Deposit Capture (RDC)	No.
19 I	Sponsoring Private ATMs	No .
19 m	Stored Value Instruments	Yes
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
19 p	For each of the following please state whether you	
ıah		
	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	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	Due Diligence
	Sale of Monetary Instruments	No .
19 p4	Sale of Monetary Instruments If we state the applicable level of due diligence	
19 p4 19 p4a	If yes, state the applicable level of due diligence	
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	Occasional Author B	V
22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML,	1-10
24	CTF & Sanctions Compliance Department? Is the Entity's AML, CTF & Sanctions policy approved at	
47	least annually by the Board or equivalent Senior	
	Management Committee? If N, describe your practice in	Yes
	Question 29.	
25	Does the Board receive, assess, and challenge regular	
	reporting on the status of the AML, CTF, & Sanctions	Yes
	programme?	
26	Does the Entity use third parties to carry out any	Yes
	components of its AML, CTF & Sanctions programme?	ies
26 a	If Y, provide further details	
		AND 11 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 11 10 10
		AML activities are outsourced to our Head Office Cassa di Risparmio di Bolzano SPA.
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	Yes
28 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context	
	to the answers in this section.	
	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and	Yes
	requirements to reasonably prevent, detect and report bribery and corruption?	
31	Does the Entity have an enterprise wide programme that	
•.	sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers	
	with sufficient experience/expertise responsible for	Yes
	coordinating the ABC programme?	
22	Does the Entity have adequate staff with appropriate	
33	Bood the Entity have adequate stan with appropriate	
33	levels of experience/expertise to implement the ABC	Yes
	levels of experience/expertise to implement the ABC programme?	
34	levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to:	Yes Both joint ventures and third parties acting on behalf of the Entity
34 35	levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that:	
34	levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This	
34 35	levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or	Both joint ventures and third parties acting on behalf of the Entity
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34 35 35 a	levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any	Both joint ventures and third parties acting on behalf of the Entity Yes Yes
34 35 35 a 35 b 35 c	levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Both joint ventures and third parties acting on behalf of the Entity Yes Yes
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34 35 35 a 35 b 35 c	levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Both joint ventures and third parties acting on behalf of the Entity Yes Yes Yes
34 35 35 a 35 b 35 c	levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular	Both joint ventures and third parties acting on behalf of the Entity Yes Yes
34 35 35 a 35 b 35 c	levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Both joint ventures and third parties acting on behalf of the Entity Yes Yes Yes
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34 35 35 a 35 b 35 c	levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Both joint ventures and third parties acting on behalf of the Entity Yes Yes Yes
34 35 35 a 35 b 35 c 36 37 38	levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Post joint ventures and third parties acting on behalf of the Entity Yes Yes Yes Yes
34 35 35 a 35 b 35 c	levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Post joint ventures and third parties acting on behalf of the Entity Yes Yes Yes Yes
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34 35 35 a 35 b 35 c 36 37 38	levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed.	Post joint ventures and third parties acting on behalf of the Entity Yes Yes Yes Yes
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34 35 35 a 35 b 35 c 36 37 38 38 a	levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other	Both joint ventures and third parties acting on behalf of the Entity Yes Yes Yes Yes Yes Yes
34 35 35 35 a 35 b 35 c 36 37 38 38 a 39 40 40 a	levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate	Both joint ventures and third parties acting on behalf of the Entity Yes Yes Yes Yes Yes Your same and third parties acting on behalf of the Entity Yes Yes No
34 35 35 35 a 35 b 35 c 36 37 38 38 a	levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage. Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and	Both joint ventures and third parties acting on behalf of the Entity Yes Yes Yes Yes Yes Yes Yes Ye
34 35 35 35 a 35 b 35 c 36 37 38 38 a 39 40 40 a	levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or	Both joint ventures and third parties acting on behalf of the Entity Yes Yes Yes Yes Yes Yes Yes Ye
34 35 35 a 35 b 35 c 36 37 38 38 a 39 40 40 a 40 b	levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Both joint ventures and third parties acting on behalf of the Entity Yes Yes Yes Yes Yes Yes Yes Ye
34 35 35 35 a 35 b 35 c 36 37 38 38 a 39 40 40 a	levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or	Both joint ventures and third parties acting on behalf of the Entity Yes Yes Yes Yes Yes Yes Yes Ye
34 35 35 a 35 b 35 c 36 37 38 38 a 39 40 40 a 40 b	levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those	Both joint ventures and third parties acting on behalf of the Entity Yes Yes Yes Yes Yes Yes Yes Ye
34 35 35 a 35 b 35 c 36 37 38 38 a 39 40 40 a 40 b	levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials Corruption risks associated with gifts and hospitality,	Both joint ventures and third parties acting on behalf of the Entity Yes Yes Yes Yes Yes Yes Yes Ye
34 35 35 a 35 b 35 c 36 37 38 38 a 39 40 40 a 40 b	levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage. Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political	Both joint ventures and third parties acting on behalf of the Entity Yes Yes Yes Yes Yes Yes Yes Ye
34 35 35 35 a 35 b 35 c 36 37 38 38 a 39 40 40 a 40 b	levels of experience/expertise to implement the ABC programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials Corruption risks associated with gifts and hospitality,	Both joint ventures and third parties acting on behalf of the Entity Yes Yes Yes Yes Yes Yes Yes Ye

40 e	Changes in business activities that may materially	
40 e	increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	No
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
42 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	No
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	Whit reference to CBDDQ Questions n. 42-43, ABC training is provided to all amployees in the context of the requirements of Italian Law, D.LGS. 231/2001. A specififc, more targeted training is under development and is expected to be implementaded before the end of this year.
5. AML, C	TF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent,	
46 a	detect and report: Money laundering	Yes
46 a 46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least	
48	annually? Has the Entity chosen to compare its policies and	Yes
40	procedures against:	
48 a	U.S. Standards	No
48 a1	If Y, does the Entity retain a record of the results?	TNO
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	Yes
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes

40:	Define the present for acceleting financial crime risk	
49 i	Define the process for escalating financial crime risk	
	issues/potentially suspicious activity identified by	Yes
	employees	
49 j	Define the process, where appropriate, for terminating	
•	existing customer relationships due to financial crime	Yes
		res
	risk	
49 k	Define the process for exiting clients for financial	
43 K		L.
	crime reasons that applies across the entity, including	Yes
	foreign branches and affiliates	
49 I	Define the process and controls to identify and handle	
49 1		
	customers that were previously exited for financial	Yes
	crime reasons if they seek to re-establish a	res
	relationship	
49 m	Outline the processes regarding screening for	
		Yes I
	sanctions, PEPs and Adverse Media/Negative News	
40	Outline the processes for the maintenance of internal	
49 n		Yes
	"watchlists"	
50	Has the Entity defined a risk tolerance statement or	
30		l _v
	similar document which defines a risk boundary around	Yes
	their business?	
E4	Does the Entity have record retention procedures that	
51		Yes
	comply with applicable laws?	
51 a	If Y, what is the retention period?	
υ. α	, max is an reterinion period:	
	Í	le
		5 years or more
	0 5 0 1 1	
52	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	100
FO -	If N, clarify which questions the difference/s relate to	
52 a		
	and the branch/es that this applies to.	
	· · · · · · · · · · · · · · · · · · ·	
53	If appropriate, provide any additional information/context	
••	to the answers in this section.	
	to the answers in this section.	Nist A sufficient
		Not Applicable
	TE 9 CANCTIONS DISK ASSESSMENT	
6. AML, CT	FF & SANCTIONS RISK ASSESSMENT	
6. AML, CT 54	Does the Entity's AML & CTF EWRA cover the inherent	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54	Does the Entity's AML & CTF EWRA cover the inherent	Yes
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	
54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Yes
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Yes
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Yes
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls	Yes Yes
54 a 54 b 54 c 54 d 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes Yes Yes
54 a 54 b 54 c 54 d 55 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes Yes Yes
54 a 54 b 54 c 54 d 55 a 55 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 a 55 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 d 55 a 55 b 55 c 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	Yes
54 a 54 b 54 c 54 d 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative	Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 d 55 a 55 b 55 c 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 e 55 f 55 g	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 e 55 f 55 g	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 e 55 f 55 g	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in	Yes
54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
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	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
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	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 a 57 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 a 57 a 57 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 a 57 a 57 a 57 c 57 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 a 57 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 a 57 a 57 a 57 c 57 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 a 57 a 57 a 57 c 57 d 58	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h 56 a 57 a 57 a 57 a 57 a 57 d 58 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 a 57 a 57 a 57 c 57 d 58	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57 a 57 a 57 c 57 d 58 a 58 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 c 55 d 55 e 55 f 56 a 57 a 57 a 57 a 57 a 57 c 57 a 58 a 58 a 58 a 58 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance List Management	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57 a 57 a 57 c 57 d 58 a 58 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 a 57 a 57 c 57 a 57 c 57 c 58 a 58 a 58 a 58 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance List Management	Yes

58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the	Yes
	last 12 months?	
59 a	If N, provide the date when the last Sanctions EWRA	
	was completed.	
60	Confirm that all responses provided in the above Section	
00	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.	We do not have a specific Sanctions EWRA, ma AML&CTF EWRA includes the elements listed in Q.57-58
		We do not have a specific danations EVIVA, the Award of EVIVA includes the clements listed in 4.57-56
7, KYC, C	DD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	
	CDD must be completed, e.g. at the time of onboarding	Yes
	or within 30 days?	
64	Which of the following does the Entity gather and retain	
	when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	No
66	What is the Entity's minimum (lowest) threshold applied to	25%
	beneficial ownership identification?	2070
67	Does the due diligence process result in customers	Yes
	receiving a risk classification?	• • • • • • • • • • • • • • • • • • • •
67 a	If Y, what factors/criteria are used to determine the	
·	customer's risk classification? Select all that apply:	V
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	
		Use of cash, transactions with foreign countries, etc.
		555 5. 545.1, Manadonono With Foroign Countries, 616.
68	For high risk non-individual customers, is a site visit a part	Yes
	of your KYC process?	100
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4	Other	Yes
68 a4a	If yes, please specify "Other"	
		While a site visit is not mandatory, a periodic site visit is customary for all customers and in particular for high
		profiles and/or when they are granted credit lines.
		,, ,
69	Does the Entity have a risk based approach to screening	
03	customers for Adverse Media/Negative News?	Yes
	customers for Adverse intedia/negative news?	100
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes
33 az	1 ATOTOROWAI	100

Ves			
Activents Mediantegrative News? 1 Does the Entity have an International Control of Control of State (1997) and the Control of	69 a3	Trigger event	Yes
Affective fuerbooksequery reversion of controlled parties to determine whether they are PEPs, controlled by PEPs? 71 a	70	What is the method used by the Entity to screen for	Combination of automated and manual
The control of the properties of determine whether they are FEN, or controlled by FENY? To a FEN, or controlled by FENY? To a FENY to the set of the properties of determine whether they are FEN, or controlled by FENY? To a FENY to the set of the properties of t		Adverse Media/Negative News?	Combination of automated and manual
Does the Entity have parties to determine whether final to the Combination of automated and manual contents of the Entity have protected by FERP 7. 18	71		
they are PEPs, or controlled by PEPs? 18 17 is the air 19 19 18 18 18 18 18 18		customers and connected parties to determine whether	
Fig. a file			Yes
71 a2		1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	
71 a2	71 a	If Y is this at:	
71 a3 Tagger event United by the Entity to some PEPA's Combination of automated and manual Combination of automated and part Personal Combination of automated and manual Combination of automated Combination of Automated Combination of Automated Combination of Automated Combination of Personation of Personation of Personation of Combination			Vec
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to review and sessable potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 74. a If yes, select all that apply. 75. a Does the Eritly maintain and report metrics on current apply. 76. a Does the Eritly maintain and report metrics on current apply. 76. a Arma, definen, military are provided to this apply of the provided of the	72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
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74 at 1 Less than one year			
74.43 3 - 4 years Yes	74 a		
74.94 S years rore Yes	74 a1		
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Feb		prohibited by the Entity's FCC programme?	
Feb	76 a	Arms defence military	Prohibited
If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? To C		•	
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Correspondent Banking Principles 2022?	76 b1		L.
Form			Yes
Always subject to EDD			
Fee			
Feet	76 d	Extractive industries	Always subject to EDD
Tell	76 e	Gambling customers	Always subject to EDD
Tell	76 f	General Trading Companies	No EDD/restriction or prohibition
Test			
76 i Non-account customers			
76 Non-Government Organisations EDD on risk-based approach			
76 k			
Recommendation		<u> </u>	
Payment Service Providers			
76 n PEPs			
76 o PEP Close Associates	76 m	Payment Service Providers	EDD on risk-based approach
76 o PEP Close Associates	76 n	PEPs	Always subject to EDD
PEP Related Always subject to EDD			
76 q Precious metals and stones Always subject to EDD 76 r Red light businesses/Adult entertainment Do not have this category of customer or industry 76 s Regulated charities EDD on risk-based approach 76 t Shell banks Prohibited 76 u Travel and Tour Companies No EDD/restriction or prohibition 76 v Unregulated charities EDD on risk-based approach 76 w Used Car Dealers No EDD/restriction or prohibition 76 x Virtual Asset Service Providers Always subject to EDD 77 Other (specify) Always subject to EDD: companies with an opaque chain of control, trusts, trust companies, anonymous companies, civil engineering linked to pubblic procurements, companies in the renewable energy sector, waste recycling, production of concrede, production and wholesale of tabacco.			
Red light businesses/Adult entertainment Do not have this category of customer or industry			
Regulated charities EDD on risk-based approach			, ,
Total and Tour Companies Prohibited			
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To be a companies To b		Unregulated charities	EDD on risk-based approach
76 x Virtual Asset Service Providers Always subject to EDD 76 y Other (specify) Are also subject to EDD: companies with an opaque chain of control, trusts, trust companies, anonymous companies, civil engineering linked to pubblic procurements, companies in the renewable energy sector, waste recycling, production of concrede, production and wholesale of tabacco. 77 If restricted, provide details of the restriction 78 Does EDD require senior business management and/or			
Other (specify) Are also subject to EDD: companies with an opaque chain of control, trusts, trust companies, anonymous companies, civil engineering linked to pubblic procurements, companies in the renewable energy sector, waste recycling, production of concrede, production and wholesale of tabacco. 77 If restricted, provide details of the restriction Does EDD require senior business management and/or Yes			
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recycling, production of concrede, production and wholesale of tabacco. 77 If restricted, provide details of the restriction 78 Does EDD require senior business management and/or			
77 If restricted, provide details of the restriction 78 Does EDD require senior business management and/or Yes			
78 Does EDD require senior business management and/or Yes			responing, presenting of controlled, production and wholesale of tabacco.
78 Does EDD require senior business management and/or Yes	77	If restricted, provide details of the restriction	
	• •		
	78	Does EDD require senior business management and/or	V
	-		res

78 a If Y indicate who provides the approval: Senior business management 79 Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	
entities that handle client money such as lawyers, No	1
accountants, consultants, real estate agents?	
Does the Entity perform an additional control or quality Yes	
review on clients subject to EDD? 81 Confirm that all responses provided in the above Section	
are representative of all the LE's branches	
81 a If N, clarify which questions the difference/s relate to	
and the branch/es that this applies to	
82 If appropriate, provide any additional information/context	
to the answers in this section. Regarding non- account customers, being a local bank in a turistic region	we offer foreign exchange services and
payments for utility bills in cash for small amounts, applying ordinary Due	,
payment of damy and mountaine, applying ordinary and	, 2geee.
8. MONITORING & REPORTING	
83 Does the Entity have risk based policies, procedures and	
bos lite citing have insk based policies, procedures and monitoring processes for the identification and reporting Yes	
of suspicious activity?	
What is the method used by the Entity to monitor Combination of automated and manual	
transactions for suspicious activities?	
84 a If manual or combination selected, specify what type	
of transactions are monitored manually The Bank uses automated algorithms in order to monitor transactions, but	
automated application is subsequently evaluated by branch managers o	other customer managers.
84 b If automated or combination selected, are internal Both	
system or vendor-sourced tools used?	
84 b1 If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	
NETECH NORDESTTECHNOLOGY	
N/4 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
84 b2 When was the tool last updated? < 1 year	
84 b3 When was the automated Transaction Monitoring <1 year	
application last calibrated?	
Does the Entity have regulatory requirements to report suspicious transactions?	
Sta If Y, does the Entity have policies, procedures and	
processes to comply with suspicious transaction Yes	
reporting requirements?	
86 Does the Entity have policies, procedures and processes	
to review and escalate matters arising from the Yes	
monitoring of customer transactions and activity?	
87 Does the Entity have a data quality management	
programme to ensure that complete data for all Yes	
transactions are subject to monitoring? Does the Entity have processes in place to respond to	
Request For Information (RFIs) from other entities in a	
timely manner?	
89 Does the Entity have processes in place to send	
Requests for Information (RFIs) to their customers in a Yes	
timely manner?	
90 Confirm that all responses provided in the above Section are representative of all the LE's branches	
90 a If N, clarify which questions the difference/s relate to	
and the branch/es that this applies to	
91 If appropriate, provide any additional information/context	
to the answers in this section.	
	l
9. PAYMENT TRANSPARENCY 92. Page the Estituadhers to the Welfshers Croup Reument	

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	
33 b i	ir, specify the regulation	REGULATION (EU) 2015/1847 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 20 May 2015 on infromation accompanying transfers of founds.
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC	TIONS	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Both Automated and Manual
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	NETECH NORDESTTECHNOLOGY
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	< 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 Lists?	Yes
104	What is the method used by the Entity?	Combination of automated and manual
105	Does the Entity have a data quality management programme to ensure that complete data for all	Yes
106	transactions are subject to sanctions screening? Select the Sanctions Lists used by the Entity in its	
106 a	sanctions screening processes: Consolidated United Nations Security Council	Ligad for excepting customers and handical owners and for filtering transcational data
106 b	Sanctions List (UN) United States Department of the Treasury's Office of	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Foreign Assets Control (OFAC) Office of Financial Sanctions Implementation HMT	Used for screening customers and beneficial owners and for filtering transactional data
	(OFSI)	Used for screening customers and beneficial owners and for filtering transactional data

106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	,
		World Check Lists
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	q102 a2 - in 2023, when we bought the NETECH software
11. TRAINI	ING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to :	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
112 f	Non-employed workers (contractors/consultants)	Not Applicable
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes

115 а		
	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context	
110	to the answers in this section.	
	to the answers in this section.	II
12. QUALIT	Y ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality	
	Assurance programme for financial crime (separate from	Yes
	the independent Audit function)?	
118	Does the Entity have a program wide risk based	
	Compliance Testing process (separate from the	Yes
119	independent Audit function)? Confirm that all responses provided in the above Section	
119	are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to	
115 a	and the branch/es that this applies to.	
	and the braner jee that the applies to.	
120	If appropriate, provide any additional information/context	
	to the answers in this section.	
		"
13. AUDIT		
121	In addition to inspections by the government	
	supervisors/regulators, does the Entity have an internal	
	audit function, a testing function or other independent	Yes
	third party, or both, that assesses FCC AML, CTF, ABC,	res
	Fraud and Sanctions policies and practices on a regular	
	basis?	
122	How often is the Entity audited on its AML, CTF, ABC,	
	Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Component based reviews
123	Does the internal audit function or other independent third	
	party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and	Yes
	procedures	
123 b	Enterprise Wide Risk Assessment	No .
	Governance	Yes Yes
123 c	KYC/CDD/EDD and underlying methodologies	
123 d	Name Constitution Office Management	
123 d 123 e	Name Screening & List Management	Yes
123 d 123 e 123 f	Reporting/Metrics & Management Information	Yes Yes
123 d 123 e 123 f 123 g	Reporting/Metrics & Management Information Suspicious Activity Filing	Yes Yes Yes
123 d 123 e 123 f 123 g 123 h	Reporting/Metrics & Management Information Suspicious Activity Filing Technology	Yes Yes Yes Yes Yes
123 d 123 e 123 f 123 g 123 h 123 i	Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring	Yes Yes Yes Yes Yes Yes
123 d 123 e 123 f 123 g 123 h 123 i 123 j	Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions	Yes Yes Yes Yes Yes Yes Yes Yes
123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k	Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education	Yes Yes Yes Yes Yes Yes
123 d 123 e 123 f 123 g 123 h 123 i 123 j	Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions	Yes Yes Yes Yes Yes Yes Yes Yes
123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k	Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education	Yes Yes Yes Yes Yes Yes Yes Yes
123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k	Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education	Yes Yes Yes Yes Yes Yes Yes Yes
123 d 123 e 123 f 123 g 123 h 123 i 123 i 123 j 123 k	Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify)	Yes Yes Yes Yes Yes Yes Yes Yes
123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k	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 d 123 e 123 f 123 g 123 h 123 i 123 i 123 j 123 k	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 Yes Yes Yes Yes Yes Yes Yes
123 d 123 e 123 f 123 f 123 h 123 i 123 i 123 j 123 k 123 l	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 d 123 e 123 f 123 g 123 h 123 i 123 i 123 j 123 k	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	Yes
123 d 123 e 123 f 123 g 123 i 123 i 123 i 123 i 123 i 124	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 d 123 e 123 f 123 f 123 h 123 i 123 i 123 j 123 k 123 l	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 d 123 e 123 f 123 g 123 i 123 i 123 i 123 i 123 i 124	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 d 123 e 123 f 123 g 123 i 123 i 123 i 123 i 123 i 124	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 d 123 e 123 f 123 g 123 h 123 i 123 i 123 i 123 z 123 k 123 l	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 d 123 e 123 f 123 g 123 i 123 i 123 i 123 i 123 i 124	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 d 123 e 123 f 123 g 123 h 123 i 123 i 123 i 123 z 123 k 123 l	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 d 123 e 123 f 123 g 123 h 123 i 123 i 123 i 123 z 123 k 123 l	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 d 123 e 123 f 123 g 123 h 123 i 123 i 123 i 123 z 123 k 123 l	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 d 123 e 123 f 123 f 123 h 123 i 123 i 123 i 123 i 123 j 123 k 123 l 125 a	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 d 123 e 123 f 123 f 123 h 123 i 123 i 123 i 123 i 123 i 123 a 125 a	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 d 123 e 123 f 123 f 123 h 123 i 123 i 123 i 123 i 123 j 123 k 123 l 125 a	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 d 123 e 123 f 123 f 123 h 123 i 123 i 123 i 123 i 123 i 123 a 125 a	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 d 123 e 123 f 123 f 123 h 123 i 123 j 123 k 123 l 125 1 126	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 fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	we do not currently have a specific Policy addressing Fraud risk since this risk is managed throughout the policies of the Bank. We do have authentication protocols through OTP device regarding trnsfers and a transacrion monitoring application.
<u>Declarat</u>	tion Statement	

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)
Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)

BANCA DI CIVIDALE SPA (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

MASSIMILIANO MANCA			
l,	_ (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers		
provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.			
ELENA DE PAOLI			
l,	_ (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are		
complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.			
	(Signature & Date)		
	. •		
	(Signature & Date)		
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