

## Cross-border Correspondent Relationship Extensive Due Diligence Questionnaire

Name of the Financial Institution (referred to as the Correspondent Institution)	
Jurisdiction of the Correspondent Institution	

The questionnaire shall be completed *in addition* to and considered together with the customer due diligence measures and additional or enhanced due diligence measures under the Guideline on Anti-Money Laundering and Counter-Financing of Terrorism (For Licensed Corporations) (the "AML Guideline") issued by the Securities and Futures Commission of Hong Kong. This sample questionnaire serves as a reference only. Financial Institutions shall adopt a risk-based approach in applying the additional due diligence measures and supplement this questionnaire where appropriate.

The Respondent Institution (RI) should answer the questionnaire at the **legal entity level** including any branches and/or subsidiaries (referred to as an Entity) for which the client base, products and control model are materially similar to the RI Head Office/ Parent Company. Each question in the CBDDQ will need to be addressed from the perspective of the RI and on behalf of all of its branches and/or subsidiaries. If a response for the RI differs for one of its branches and/or subsidiaries, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch/subsidiary's business activity (products offered, client base etc.) is materially different than its RI Head Office/ Parent Company, a separate questionnaire can be completed for that branch/subsidiary.

*\* Delete as inappropriate*

No #	Question	Response
<b>1. ENTITY, MANAGEMENT &amp; OWNERSHIP</b>		
1.	Full Legal Name of the Respondent Institution	
2.	Append a list of foreign branches and/or subsidiaries which are covered by this questionnaire	
3.	Full Legal (Registered) Address	
4.	Full Primary Business Address (if different from above)	
5.	Date of Entity incorporation/ establishment  <i>If the full date is not available, provide the year and explain why the full date is not available.</i>	
6.	Place of Incorporation	
7.	Jurisdiction(s) that the Entity carries out its business	
8.	Select type of ownership and append an ownership chart (which should include percentage of ownership and the full name of all parent entities and ultimate beneficial owners)	
8.1	Publicly Traded (i.e. ≥25% of its ordinary shares or common stock are publicly traded/ listed on stock exchange)	Yes / No *  If you are a publicly traded entity, please indicate the exchange you traded on and unique ID used each stock exchange to identify the security.

<b>8.2</b>	Member Owned/ Mutual (e.g. building society, friendly society, credit union, registered society etc)	Yes / No *
<b>8.3</b>	Government or State Owned by 25% or more (either directly/ indirectly)	Yes / No *
<b>8.4</b>	Privately Owned	Yes / No *  If Yes, provide details (including full names and percentage held) of immediate shareholders and ultimate beneficial owners with a holding of 10% or more
<b>8.5</b>	Others (Please specify)	Yes / No *
<b>9.</b>	Is the RI part of a group?	Yes / No *  If yes, <ul style="list-style-type: none"> <li>• please provide full name of the financial group</li> <li>• please append a list of entities belonging to the same group that establish cross-border correspondent relationship with the Correspondent Institution.</li> </ul>
<b>10.</b>	Please append a list of current directors containing each director's name, title, date of appointment and respective functions/ roles	
<b>11.</b>	Please append a list of senior management containing each senior management's name, title, date of appointment, reporting line and respective functions/ roles.  Please also indicate the responsible officers for AML/ CFT functions.	
<b>12.</b>	Was there any change in the composition of the Board of Directors and/or Executive Committee/Conducting Officers in your company and whether there was a change in the Ultimate Beneficial Owner since you last filled in this form.	Yes / No / Not Applicable*  If yes, please describe the changes.
<b>13.</b>	% of the Entity's total shares composed of bearer shares (i.e. shares whereby ownership is assigned to whoever has physical possession of the share certificates)	
<b>14.</b>	Name of primary financial regulator / supervisory authority (i.e. the regulator primarily responsible for oversight of anti-money laundering (AML), counter terrorist finance (CTF) and other types of financial crime compliance)	Please provide the licence/registration number.
<b>15.</b>	Provide Legal Entity Identifier (LEI) if available	
<b>16.</b>	Provide the full legal name of the ultimate parent who effectively holds/ controls majority voting power over the responding party (if different from the Entity completing the DDQ)	
<b>17.</b>	Jurisdiction of licensing authority and regulator of ultimate parent	
<b>18.</b>	Select the business area(s) and activities applicable to/ offered by the Entity (Select all that apply)	
<b>18.1</b>	Securities Services / Custody	Yes / No *

<b>18.2</b>	Asset/ Portfolio Management	Yes / No *
<b>18.3</b>	Financial Markets Trading	Yes / No *
<b>18.4</b>	Broker / Dealer	Yes / No *
<b>18.5</b>	Insurance	Yes / No *
<b>18.6</b>	Deposit taking	Yes / No *
<b>18.7</b>	Commercial/ Retail Banking	Yes / No *
<b>18.8</b>	Investment Banking	Yes / No *
<b>18.9</b>	Credit Union	Yes / No *
<b>18.10</b>	Distributor	Yes / No *
<b>18.11</b>	Advisory	Yes / No *
<b>18.12</b>	Other (Please specify)	
<b>19.</b>	What are the types of underlying clients the Entity provides its service or products to?	<input type="checkbox"/> Individual clients (Percentage in the entire portfolio: _____ %) <input type="checkbox"/> Institutional clients (Percentage in the entire portfolio: _____ %) <input type="checkbox"/> Listed Companies <input type="checkbox"/> Private Companies <input type="checkbox"/> Asset Management Firms <input type="checkbox"/> Brokerage Firms/ Securities Firms <input type="checkbox"/> Banks <input type="checkbox"/> Insurance Companies <input type="checkbox"/> Investment Vehicles (Funds) <input type="checkbox"/> Others (please specify)
<b>20.</b>	Please provide the top 5 jurisdiction where the Entity's customers primarily resident in, with the respective percentage of the entire customer portfolio.	
<b>21.</b>	Please provide the top 5 jurisdiction of customers which generate the most revenue for the Entity, with the respective percentage of the total revenue.	
<b>22.</b>	What is the target Markets of the Entity (i.e. the markets in which the Entity that carries out, publicizes, makes invitation or offers to carry out financial services business)	
<b>23.</b>	Is the Entity responsible for placing deals?	Yes / No*  If no, what is the legal name of the entity responsible for placing deals?
<b>24.</b>	Please provide the number of full-time employees of the Entity	<input type="checkbox"/> 0 <input type="checkbox"/> 1 - 50 <input type="checkbox"/> 51 - 200 <input type="checkbox"/> 201 - 500 <input type="checkbox"/> 501 - 1000 <input type="checkbox"/> 1001 - 5000 <input type="checkbox"/> 5001 - 10000 <input type="checkbox"/> 10001 +
<b>25.</b>	Please provide total Assets of the Entity per its latest audited balance sheet	<input type="checkbox"/> > US\$500 million <input type="checkbox"/> > US\$100 million and ≤ US\$500 million <input type="checkbox"/> > US\$10 million and ≤ US\$100 million <input type="checkbox"/> ≤ US\$10 million

26.	Confirm that all responses provided in the above Section ENTITY, MANAGEMENT & OWNERSHIP are representative of all the RI's branches and/or subsidiaries	Yes / No *  If no, please clarify which questions the difference/s relate to, explain the difference and identify the branch/es and/or subsidiary/ies that this applies to.
27.	If appropriate, provide any additional information / context to the answers in this section	

2. PRODUCTS & SERVICES		
28.	Does the Entity offer the following products and services directly to its customers (as opposed to acting as an Introducer or Intermediary) (Select all that apply):	
28.1	Asset Management	Yes / No *
28.2	Bilateral, Club & Syndicated Loans	Yes / No *
28.3	Brokerage /Dealer	Yes / No *
28.4	Commodities Trading	Yes / No *
28.5	Cross Border Remittances	Yes / No *
28.6	Currency Exchange/ Foreign Exchange Trading	Yes / No *
28.7	Custodian service	Yes / No *
28.8	Debt Capital Market	Yes / No *
28.9	Derivatives Trading	Yes / No *
28.10	Deposit taking	Yes / No *
28.11	Distribution	Yes / No *
28.12	Equity Capital Market	Yes / No *
28.13	Futures Contracts	Yes / No *
28.14	Loan financing	Yes / No *
28.15	Money Markets Instruments (Certificates of Deposit, Commercial Paper etc)	Yes / No *
28.16	Repos/ securities lending	Yes / No *
28.17	Securities trading	Yes / No *
28.18	Stored Value Instruments	Yes / No *  If yes, please provide examples of Stored Value Instrument the Entity provides e.g. prepaid cards, e-wallet, government benefit cards.
28.19	Virtual /Digital Currencies	Yes / No *
28.20	Underwriting	Yes / No *
28.21	Other high-risk products and services identified by the Entity  <i>The definition of high risk is based on the Entity local regulations and/or the industry standard issued by bodies such as FATF, SFC etc.</i>	Yes / No *  If yes, please provide:  If no, please provide context to your response (e.g. the Entity does not provide any additional high-risk products)
29.	Please confirm/ provide the following in relation to the Entity's cross-border correspondent relationships.	
29.1	What is the purpose of this cross-border correspondent relationship with the Correspondent Institution?	

29.2	What is the types and nature of services to be provided by the Correspondent Institution under this cross-border correspondent relationship?	
29.3	What is the expected value and volume of transactions under this cross-border correspondent relationship with the Correspondent Institution?	
29.4	Does the Entity provide nested correspondent relationships <sup>1</sup> to its underlying customers?	Yes / No *
29.5	What kind of entities does the Entity form nested correspondent relationships with as Correspondent Institution: <ul style="list-style-type: none"> <li>• domestic financial institutions</li> <li>• foreign financial institutions</li> <li>• related foreign financial institutions</li> <li>• Money or value transfer services (MVTs)/ Money Services Business (MSB)</li> </ul>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
29.6	What is the purpose of the nested correspondent relationships?	
29.7	Does the Entity have processes and procedures in place to <b>identify</b> the nested/ downstream correspondent relationships? Please elaborate.	Yes / No *
29.8	Does the Entity have processes and procedures in place to <b>control</b> the nested/ downstream correspondent relationships? Please elaborate.	Yes / No *
30.	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the Entity's branches and/or subsidiaries	Yes / No *  If no, please clarify which questions the difference/s relate to, explain the difference and identify the branch/es and/or subsidiary/ies that this applies to.
31.	If appropriate, provide any additional information / context to the answers in this section.	

3. AML, CTF & SANCTIONS PROGRAMME		
32.	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
32.1	Appointed Officer with sufficient experience/expertise  <i>"Sufficient experience/expertise" is based on local regulatory expectations and industry standards in the jurisdiction where the Entity is based, considering the type of role previously undertaken and length of time in the financial industry compliance sector.</i>	Yes / No *
32.2	Cash Reporting	Yes / No / Not Applicable *  Please provide further information if cash reporting is not applicable.

<sup>1</sup> Nested correspondent relationship (or downstream correspondent relationship) refers to the use of a correspondent account by a number of respondent institutions through their relationships with the correspondent institution's direct respondent institution, to conduct transactions and obtain access to other financial services.

<b>32.3</b>	Customer Due Diligence ( <b>CDD</b> )	Yes / No *  If underlying customer(s) have direct access to the correspondent account, whether the Entity would conduct CDD to verify their identities and continuously monitor its business relationships with them, in accordance with the AML requirements.  Yes / No *
<b>32.4</b>	Additional / enhanced due diligence measures to mitigate the risk of Money Laundering or Terrorist Financing ( <b>ADD</b> )	Yes / No *
<b>32.5</b>	Beneficial Ownership	Yes / No *
<b>32.6</b>	Independent Testing	Yes / No *
<b>32.7</b>	Periodic Review	Yes / No *
<b>32.8</b>	Policies and Procedures aligned with the three Lines of Defence model	Yes / No *
<b>32.9</b>	Risk Assessment and Rating (including assessment of inherent money laundering, terrorism financing, sanctions and bribery and corruption risks present within or in connection with the Entity, as well as the mitigating controls implemented)	Yes / No *
<b>32.10</b>	Sanctions	Yes / No *
<b>32.11</b>	Politically Exposed Person (PEP) Screening	Yes / No *
<b>32.12</b>	Adverse Information Screening	Yes / No *
<b>32.13</b>	Suspicious Activity Reporting	Yes / No *
<b>32.14</b>	Training and Education (i.e. activities delivered either internally or by third party with attendance record maintained to educate employees, taking into account the Company's Policy and Procedure)	Yes / No *
<b>32.15</b>	Transaction Monitoring	Yes / No *
<b>33.</b>	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department (or equivalent in the second line of defence) (Excluding contractors and temporary staff)?	<input type="checkbox"/> Less than 10 <input type="checkbox"/> 10 – 50 <input type="checkbox"/> 51+
<b>34.</b>	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes / No *  If no, please describe your practice.
<b>35.</b>	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?  <i>Reporting means management information which is reported to the senior management by way of slides, metrics and/or discussion which can be evidenced by minutes.</i>	Yes / No *  If yes, please describe the frequency of reporting. <input type="checkbox"/> Monthly <input type="checkbox"/> Quarterly <input type="checkbox"/> Half-annually <input type="checkbox"/> Annually <input type="checkbox"/> Others – please elaborate and include your rationale.  If no, please describe your practice and explain your rationale.

36.	Does the Entity use third parties (either related or unrelated) to carry out any components of its AML, CTF & Sanctions programme or its primary function (including risk)?	<p>Yes / No *</p> <p>If yes, please provide further details, including:-</p> <ul style="list-style-type: none"> <li>• what function is outsourced to the third party</li> <li>• its responsibilities</li> <li>• details of the location where the third party is based</li> <li>• if it is regulated and by whom</li> <li>• if it is related to the Entity</li> <li>• if the third party is subject to the same governance, policies and procedures as the Entity</li> <li>• if due diligence was performed on the service provider</li> <li>• the type and frequency of monitoring conducted on the outsourced services</li> </ul>
37.	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the Entity's branches and/or subsidiaries	<p>Yes / No *</p> <p>If no, please clarify which questions the difference/s relate to, explain the difference and identify the branch/es and/or subsidiary/ies that this applies to.</p>
38.	If appropriate, provide any additional information / context to the answers in this section.	

4. ANTI BRIBERY & CORRUPTION (ABC)		
39.	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	
40.	<p>Does the Entity have an enterprise wide programme that sets minimum ABC standards?</p> <p><i>"Enterprise wide" refers to a programme which covers all relevant functions and activities which may be impacted by bribery and corruption risks, including branches, subsidiaries and any businesses under the Entity's responsibility.</i></p>	
41.	Has the Entity appointed a designated officer or officers with sufficient experience/expertise (see the explanation in Q32.1above) responsible for coordinating the ABC programme?	<p>Yes / No *</p> <p>If yes, please provide details of the designated officer(s).</p> <p>If no, please provide explanation.</p>
42.	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme and address all the activities required under the ABC programme?	Yes / No *
43.	How many full-time staff was employed in the Entity to implement the ABC programme?	
44.	<p>Is the Entity's ABC programme applicable to:</p> <p>Please select those applicable.</p>	<p><input type="checkbox"/> Joint Venture</p> <p><input type="checkbox"/> Third parties acting on behalf of the Entity</p> <p><input type="checkbox"/> Not Applicable</p>
45.	Does the Entity have a global ABC policy that:	

45.1	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage	Yes / No *
45.2	Includes enhanced requirements regarding interaction with public officials?	Yes / No *
45.3	Includes a prohibition against the falsification of books (financial accounts) and records retained for audit purpose (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes / No *
46.	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes / No *
47.	Does the Entity's Board or Senior Management Committee receive regular Reporting (see Q35 above) on ABC matters?	Yes / No *
48.	Does the Entity perform an ongoing ABC Enterprise Wide risk assessment ( <b>EWRA</b> ) at the Entity level?	Yes / No * If yes, what is the frequency? <input type="checkbox"/> Every 12 months <input type="checkbox"/> Every 18 months <input type="checkbox"/> Others (please provide):
49.	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes / No *
50.	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
50.1	Potential liability created by intermediaries and other third-party providers as appropriate	Yes / No *
50.2	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes / No *
50.3	Transactions, products or services, including those that involve state-owned or state- controlled entities or public officials	Yes / No *
50.4	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes / No *
50.5	Changes in business activities that may materially increase the Entity's corruption risk	Yes / No *
51.	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes / No *
52.	Does the Entity provide mandatory ABC training to:	
52.1	Board and Senior Management Committee (including the Board responsible for the responding Entity, which may include the Board of the parents)	Yes / No *
52.2	1st Line of Defence (front-line, customer facing functions such as lines of business)	Yes / No *
52.3	2nd Line of Defence (risk stewards which supports the first line of defence such as Compliance, Risk or Legal)	Yes / No *



52.4	3rd Line of Defence (Independent audit function)	Yes / No *
52.5	3 <sup>rd</sup> parties to which specific compliance activities subject to ABC risk have been outsourced	Yes / No *
52.6	Non-employed workers as appropriate (contractors/consultants)	Yes / No *
53.	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes / No *
54.	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the Entity's branches and/or subsidiaries	Yes / No *  If no, please clarify which questions the difference/s relate to, explain the difference and identify the branch/es and/or subsidiaries that this applies to.
55.	If appropriate, provide any additional information / context to the answers in this section.	

5. AML, CTF & SANCTIONS AND OTHER POLICIES & PROCEDURES		
56.	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
56.1	Money laundering	Yes / No *
56.2	Terrorist financing	Yes / No *
56.3	Sanctions violations	Yes / No *
57.	Are the Entity's policies and procedures updated at least annually or upon trigger event?	Yes / No *
58.	In assessing the Entity's policies and procedures, has the Entity performed a gap analysis/ comparison against the following standards, over and above local regulatory and legal requirements?	
58.1	US Standards	Yes / No *  If yes, does the Entity retain a record of the results of the gap analysis?
58.2	EU Standards	Yes / No *  If yes, does the Entity retain a record of the results of the gap analysis?
59.	Does the Entity have policies and procedures that:	
59.1	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes / No *
59.2	Prohibit the opening and keeping of accounts for unlicensed banks and/or financial institutions	Yes / No *
59.3	Prohibit dealing with other entities that provide services to unlicensed banks and/or financial institutions	Yes / No *
59.4	Prohibit accounts/relationships with shell financial institutions <sup>2</sup>	Yes / No *
59.5	Prohibit dealing with another entity that provides services to shell financial institutions	Yes / No *

<sup>2</sup> A shell financial institution is a corporation that is incorporated and authorised to carry on financial services businesses in a place outside Hong Kong but with no physical presence in the jurisdiction it is incorporated and authorised, and which is not an affiliate of a regulated financial group that is subject to effective group-wide supervision. A corporation is considered to have "physical presence" if it carries on financial services businesses at any premises in that place or jurisdiction and at least one full-time employee of the corporation performs duties related to financial services businesses at those premises.

59.6	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes / No *
59.7	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 / No *
59.8	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes / No *
59.9	Define escalation processes for financial crime risk issues	Yes / No *
59.10	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes / No *
59.11	Specify the documented process where potentially suspicious activity identified by employees is to be escalated and investigated	Yes / No *
59.12	Outline and document the processes regarding screening for sanctions, PEPs and negative media	Yes / No *
59.13	Outline and document the processes for the maintenance of internal "watchlists" <sup>3</sup>	Yes / No *
59.14	Outline and document the financial crime policy procedures encompassing any applicable anti-bribery & corruption, anti-tax evasion, PEP Screening & sanctions regime, fraud, cybercrime/ security etc. policies and procedures	
59.15	Conflicts of interest policy	
59.16	Insider trading / market abuse	
59.17	Business continuity/disaster recovery plan	
59.18	Whistleblowing	
59.19	Fraud	
60.	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business and documents the level of the exposure beyond which the Entity is not prepared to accept additional risks?	Yes / No *
61.	Does the Entity have a record retention procedures that comply with applicable laws?  <i>Records includes customer due diligence information, outcome of screening controls, escalation and decisions made by Senior Management and others etc.</i>	Yes / No *  If yes, what is the retention period?
62.	Does the Entity subject to any applicable law, or conditions to provide documents, data or information in relation to any particular transactions or any underlying clients when requested by the Correspondent Institution?	Yes / No *  If yes, please provide details.
63.	Please describe your method for country risk assessment, as well as the frequency, approval and escalation.	
64.	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the Entity's branches and/or subsidiaries	Yes / No *  If no, please clarify which questions the difference/s relate to, explain the difference and identify the branch/es and/or subsidiary/ies that this applies to.
65.	If appropriate, provide any additional information / context to the answers in this section.	

3

Watch list is a compiled list where the financial institutions document the institutions/individual/others that are not designated but might present financial crime risks. This may include lists used for transaction screening only or for screening all customer, staff and third party service provider records

6. AML, CTF & SANCTIONS RISK ASSESSMENT		
66.	Does the <b>Entity's AML &amp; CTF EWRA</b> cover the inherent risk components detailed below:	
66.1	Client <i>(i.e. the Entity's book and all its clients/ customers)</i>	Yes / No *
66.2	Product <i>(including all products provided by the Entity, directly or via third parties)</i>	Yes / No *
66.3	Channel <i>(i.e. the ways which the services are provided)</i>	Yes / No *
66.4	Geography <i>(i.e. the jurisdictions to which the Entity has exposure via its clients, physical presence and services provided.)</i>	Yes / No *
67.	Does the <b>Entity's AML &amp; CTF EWRA</b> cover the controls effectiveness components detailed below:	
67.1	Transaction Monitoring	Yes / No *
67.2	Customer Due Diligence	Yes / No *
67.3	PEP Identification	Yes / No *
67.4	Transaction Screening	Yes / No *
67.5	Name Screening against Adverse Media & Negative News	Yes / No *
67.6	Training and Education	Yes / No *
67.7	Governance <i>(i.e. AML &amp; CTF governance controls effectiveness, including paths of escalation, collection and dissimulation of Management Information, effectiveness of actions takes etc)</i>	Yes / No *
67.8	Management Information	Yes / No *
68.	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes / No *  If no, provide the date when the last AML & CTF EWRA was completed.
69.	Does the <b>Entity's Sanctions EWRA</b> cover the inherent risk components detailed below:	
69.1	Client	Yes / No *
69.2	Product	Yes / No *
69.3	Channel	Yes / No *
69.4	Geography	Yes / No *
70.	Does the <b>Entity's Sanctions EWRA</b> cover the controls effectiveness components detailed below:	
70.1	Customer Due Diligence	
70.2	Transaction Screening	
70.3	Name Screening	
70.4	List Management	
70.5	Training and Education	
70.6	Governance	

<b>70.7</b>	Management Information	
<b>71.</b>	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes / No *  If no, provide the date when the last AML & CTF EWRA was completed.
<b>72.</b>	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the Entity's branches and/or subsidiaries	Yes / No *  If no, please clarify which questions the difference/s relate to, explain the difference and identify the branch/es and/or subsidiary/ies that this applies to.
<b>73.</b>	If appropriate, provide any additional information / context to the answers in this section.	

<b>7. KYC, CDD and ADD</b>		
<b>74.</b>	Does the Entity verify the identity of the customer (i.e. <i>require evidence to support the information provided by/on behalf of the customer during CDD, as required</i> )?	Yes / No *
<b>75.</b>	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days	Yes / No *
<b>76.</b>	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
<b>76.1</b>	Ownership structure	Yes / No *
<b>76.2</b>	Customer identification	Yes / No *
<b>76.3</b>	Expected activity  (i.e. a clear explanation of the purpose of the account, product or service, the projected activity of the account and the ongoing activity (including the account size and values, expected transfers, intention to purchase monetary instruments and others))	Yes / No *
<b>76.4</b>	Nature of business/employment  (i.e. All types of revenue generating activity provided/performed by the customer)	Yes / No *
<b>76.5</b>	Product usage  (i.e. Type and level (e.g. value/volume) of utilisation of products)	Yes / No *
<b>76.6</b>	Purpose and nature of relationship	Yes / No *
<b>76.7</b>	Source of funds	Yes / No *
<b>76.8</b>	Source of wealth	Yes / No *
<b>77.</b>	Are each of the following <b>identified</b> :	
<b>77.1</b>	Ultimate beneficial ownership	Yes / No *  Are ultimate beneficial owners <b>verified within the ownership/control threshold set by the Entity</b> ?
<b>77.2</b>	Authorised signatories (where applicable)	Yes / No *
<b>77.3</b>	Key controllers	Yes / No *

<b>77.4</b>	Persons purporting to act on behalf of the customer (PPTA)	Yes / No *  Are PPTA verified?
<b>77.5</b>	Other relevant parties  <i>(including any other entity or individual which otherwise holds a significant ownership or controlling interest in the customer/ persons purporting to act on behalf of the customer)</i>	Yes / No *  Please specify:
<b>78.</b>	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	<input type="checkbox"/> 10% <input type="checkbox"/> 20% <input type="checkbox"/> 25% <input type="checkbox"/> 50% <input type="checkbox"/> Others (please specify the percentage):
<b>79.</b>	Does the due diligence process result in customers receiving a risk classification (i.e. a risk score or rating when assessing potential financial crime risk exposure)?	Yes / No *
<b>80.</b>	If yes, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
<b>80.1</b>	Product Usage	Yes / No *
<b>80.2</b>	Geography	Yes / No *
<b>80.3</b>	Business Type/Industry	Yes / No *
<b>80.4</b>	Legal Entity type	Yes / No *
<b>80.5</b>	Adverse Information	Yes / No *
<b>80.6</b>	Other (please specify)	Yes / No *
<b>81.</b>	Does the Entity have a risk based approach to screen customers for adverse media/negative news?	Yes / No *
<b>82.</b>	If Yes, is this at:	
<b>82.1</b>	Onboarding	Yes / No *
<b>82.2</b>	KYC renewal  <i>(i.e. Periodic, ongoing KYC/CDD review of existing customers/clients)</i>	Yes / No *
<b>82.3</b>	Trigger event  <i>(i.e. event or piece of information that alters the information in the CDD record and would cause it to be reviewed e.g. a significant breach of the AML/CFT Systems, the acquisition of new customer segments or delivery channels, the launch of new products and services, a significant change of operational processes, significant negative media, or disclosure of a regulatory order.)</i>	Yes / No *
<b>83.</b>	What is the method used by the Entity to screen for adverse media / negative news? <sup>4</sup>	<input type="checkbox"/> Automated <input type="checkbox"/> Manual <input type="checkbox"/> Combination of automated and manual

4

Automated is typically achieved through a regular automated feed of data into a screening tool which will perform name match checks against the data and generate 'alerts' for the Entity staff to review. Manual is in reference to screening that is not automated. Combination is a mix of automated and manual.

<b>84.</b>	Does the Entity have a risk based approach to screen customers and connected parties to determine whether they are Politically Exposed Persons (PEPs), or controlled by PEPs <sup>5</sup> ?	Yes / No *
<b>85.</b>	If yes, is this at:	
<b>85.1</b>	Onboarding	Yes / No *
<b>85.2</b>	KYC renewal	Yes / No *
<b>85.3</b>	Trigger event	Yes / No *
<b>86.</b>	What is the method used by the Entity to screen PEPs?	<input type="checkbox"/> Automated <input type="checkbox"/> Manual <input type="checkbox"/> Combination of automated and manual
<b>87.</b>	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes / No *
<b>88.</b>	Does the Entity have a process to review and update customer information based on:	
<b>88.1</b>	KYC renewal	Yes / No *
<b>88.2</b>	Trigger event	Yes / No *
<b>89.</b>	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes / No *
<b>90.</b>	From the list below, which categories of customers or industries are subject to ADD and/or are restricted, or prohibited by the Entity's FCC programme <sup>6</sup> ?	
<b>90.1</b>	Non-account customers	<input type="checkbox"/> ADD applies on a risk based approach <input type="checkbox"/> ADD applies and restricted on a risk based approach <input type="checkbox"/> Prohibited <input type="checkbox"/> No ADD applies, no restriction nor prohibition on a risk based approach. Please provide further details.  <input type="checkbox"/> Do not have this category of customer or industry
<b>90.2</b>	Non-resident customers	<input type="checkbox"/> ADD applies on a risk based approach <input type="checkbox"/> ADD applies and restricted on a risk based approach <input type="checkbox"/> Prohibited <input type="checkbox"/> No ADD applies, no restriction nor prohibition on a risk based approach. Please provide further details.  <input type="checkbox"/> Do not have this category of customer or industry
<b>90.3</b>	Shell Financial Institutions	<input type="checkbox"/> ADD applies on a risk based approach <input type="checkbox"/> ADD applies and restricted on a risk based approach <input type="checkbox"/> Prohibited <input type="checkbox"/> No ADD applies, no restriction nor prohibition on a risk based approach. Please provide further details.  <input type="checkbox"/> Do not have this category of customer or industry

<sup>5</sup> The institution is controlled by a PEP if a PEP holds a management position such as CEO, President, COO, CFO or a similar title. The institution is owned by a PEP if a PEP owns 25% of institution or greater.

<sup>6</sup> FCC programme is a financial institution's Financial Crime Compliance standards and controls to sufficiently meet internationally recognised standards to mitigate the Money Laundering and Terrorist Financing risks presented to financial institutions through products, customer base and jurisdiction. The same description is applicable to AML, Sanctions or ABC programmes, but focus on the specific risk area.

<b>90.4</b>	MVTS/ MSB customers	<input type="checkbox"/> ADD applies on a risk based approach <input type="checkbox"/> ADD applies and restricted on a risk based approach <input type="checkbox"/> Prohibited <input type="checkbox"/> No ADD applies, no restriction nor prohibition on a risk based approach. Please provide further details.  <input type="checkbox"/> Do not have this category of customer or industry
<b>90.5</b>	PEPs	<input type="checkbox"/> ADD applies on a risk based approach <input type="checkbox"/> ADD applies and restricted on a risk based approach <input type="checkbox"/> Prohibited <input type="checkbox"/> No ADD applies, no restriction nor prohibition on a risk based approach. Please provide further details.  <input type="checkbox"/> Do not have this category of customer or industry
<b>90.6</b>	Close family members of a PEP (PEP Related)	<input type="checkbox"/> ADD applies on a risk based approach <input type="checkbox"/> ADD applies and restricted on a risk based approach <input type="checkbox"/> Prohibited <input type="checkbox"/> No ADD applies, no restriction nor prohibition on a risk based approach. Please provide further details.  <input type="checkbox"/> Do not have this category of customer or industry
<b>90.7</b>	PEP Close Associate (which includes a PEP's widely- and publicly-known close business colleagues or personal advisors, in particular persons acting in a financial fiduciary capacity)	<input type="checkbox"/> ADD applies on a risk based approach <input type="checkbox"/> ADD applies and restricted on a risk based approach <input type="checkbox"/> Prohibited <input type="checkbox"/> No ADD applies, no restriction nor prohibition on a risk based approach. Please provide further details.  <input type="checkbox"/> Do not have this category of customer or industry
<b>90.8</b>	Correspondent Institutions	<input type="checkbox"/> ADD applies on a risk based approach <input type="checkbox"/> ADD applies and restricted on a risk based approach <input type="checkbox"/> Prohibited <input type="checkbox"/> No ADD applies, no restriction nor prohibition on a risk based approach. Please provide further details.  <input type="checkbox"/> Do not have this category of customer or industry  If ADD or ADD & restricted, does the ADD assessment contain the elements as set out in the Guideline on Anti-Money Laundering and Counter Financing of Terrorism (For Licensed Corporations) issued by the Securities and Futures Commission?  Yes / No *
<b>90.9</b>	Arms, defense, military	<input type="checkbox"/> ADD applies on a risk based approach <input type="checkbox"/> ADD applies and restricted on a risk based approach <input type="checkbox"/> Prohibited <input type="checkbox"/> No ADD applies, no restriction nor prohibition on a risk based approach. Please provide further details.  <input type="checkbox"/> Do not have this category of customer or industry
<b>90.10</b>	Atomic power	<input type="checkbox"/> ADD applies on a risk based approach <input type="checkbox"/> ADD applies and restricted on a risk based approach <input type="checkbox"/> Prohibited <input type="checkbox"/> No ADD applies, no restriction nor prohibition on a risk based approach. Please provide further details.  <input type="checkbox"/> Do not have this category of customer or industry

<b>90.11</b>	Extractive industries	<input type="checkbox"/> ADD applies on a risk based approach <input type="checkbox"/> ADD applies and restricted on a risk based approach <input type="checkbox"/> Prohibited <input type="checkbox"/> No ADD applies, no restriction nor prohibition on a risk based approach. Please provide further details.  <input type="checkbox"/> Do not have this category of customer or industry
<b>90.12</b>	Precious metals and stones	<input type="checkbox"/> ADD applies on a risk based approach <input type="checkbox"/> ADD applies and restricted on a risk based approach <input type="checkbox"/> Prohibited <input type="checkbox"/> No ADD applies, no restriction nor prohibition on a risk based approach. Please provide further details.  <input type="checkbox"/> Do not have this category of customer or industry
<b>90.13</b>	Unregulated charities	<input type="checkbox"/> ADD applies on a risk based approach <input type="checkbox"/> ADD applies and restricted on a risk based approach <input type="checkbox"/> Prohibited <input type="checkbox"/> No ADD applies, no restriction nor prohibition on a risk based approach. Please provide further details.  <input type="checkbox"/> Do not have this category of customer or industry
<b>90.14</b>	Regulated charities	<input type="checkbox"/> ADD applies on a risk based approach <input type="checkbox"/> ADD applies and restricted on a risk based approach <input type="checkbox"/> Prohibited <input type="checkbox"/> No ADD applies, no restriction nor prohibition on a risk based approach. Please provide further details.  <input type="checkbox"/> Do not have this category of customer or industry
<b>90.15</b>	Red light business / Adult entertainment	<input type="checkbox"/> ADD applies on a risk based approach <input type="checkbox"/> ADD applies and restricted on a risk based approach <input type="checkbox"/> Prohibited <input type="checkbox"/> No ADD applies, no restriction nor prohibition on a risk based approach. Please provide further details.  <input type="checkbox"/> Do not have this category of customer or industry
<b>90.16</b>	Non-Government Organisations	<input type="checkbox"/> ADD applies on a risk based approach <input type="checkbox"/> ADD applies and restricted on a risk based approach <input type="checkbox"/> Prohibited <input type="checkbox"/> No ADD applies, no restriction nor prohibition on a risk based approach. Please provide further details.  <input type="checkbox"/> Do not have this category of customer or industry
<b>90.17</b>	Virtual currencies	<input type="checkbox"/> ADD applies on a risk based approach <input type="checkbox"/> ADD applies and restricted on a risk based approach <input type="checkbox"/> Prohibited <input type="checkbox"/> No ADD applies, no restriction nor prohibition on a risk based approach. Please provide further details.  <input type="checkbox"/> Do not have this category of customer or industry
<b>90.18</b>	Marijuana	<input type="checkbox"/> ADD applies on a risk based approach <input type="checkbox"/> ADD applies and restricted on a risk based approach <input type="checkbox"/> Prohibited <input type="checkbox"/> No ADD applies, no restriction nor prohibition on a risk based approach. Please provide further details.  <input type="checkbox"/> Do not have this category of customer or industry



<b>90.19</b>	Embassies/Consulates	<input type="checkbox"/> ADD applies on a risk based approach <input type="checkbox"/> ADD applies and restricted on a risk based approach <input type="checkbox"/> Prohibited <input type="checkbox"/> No ADD applies, no restriction nor prohibition on a risk based approach. Please provide further details.  <input type="checkbox"/> Do not have this category of customer or industry
<b>90.20</b>	Gambling	<input type="checkbox"/> ADD applies on a risk based approach <input type="checkbox"/> ADD applies and restricted on a risk based approach <input type="checkbox"/> Prohibited <input type="checkbox"/> No ADD applies, no restriction nor prohibition on a risk based approach. Please provide further details.  <input type="checkbox"/> Do not have this category of customer or industry
<b>90.21</b>	Payment Service Provider	<input type="checkbox"/> ADD applies on a risk based approach <input type="checkbox"/> ADD applies and restricted on a risk based approach <input type="checkbox"/> Prohibited <input type="checkbox"/> No ADD applies, no restriction nor prohibition on a risk based approach. Please provide further details.  <input type="checkbox"/> Do not have this category of customer or industry
<b>90.22</b>	Other (specify)	<input type="checkbox"/> ADD applies on a risk based approach <input type="checkbox"/> ADD applies and restricted on a risk based approach <input type="checkbox"/> Prohibited <input type="checkbox"/> No ADD applies, no restriction nor prohibition on a risk based approach. Please provide further details.  <input type="checkbox"/> Do not have this category of customer or industry
<b>91.</b>	If restricted, please provide details of the restriction	
<b>92.</b>	Does the Entity perform an additional control or quality review on clients subject to ADD?	Yes / No *
<b>93.</b>	Confirm that all responses provided in the above Section KYC, CDD and ADD are representative of all the Entity's branches and/or subsidiaries	Yes / No *  If no, please clarify which questions the difference/s relate to, explain the difference and identify the branch/es and/or subsidiary/ies that this applies to.
<b>94.</b>	If appropriate, provide any additional information/ context to the answers in this section.	

<b>8. MONITORING &amp; REPORTING</b>		
<b>95.</b>	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes / No *
<b>96.</b>	What is the method used by the Entity to monitor transactions for suspicious activities?	<input type="checkbox"/> Automated <input type="checkbox"/> Manual <input type="checkbox"/> Combination of automated and manual
<b>97.</b>	If manual or combination selected, specify what type of transactions are monitored manually	
<b>98.</b>	Does the Entity have regulatory requirements to report suspicious transactions?	Yes / No *
<b>98.1</b>	If yes, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes / No *

99.	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes / No *
100.	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the Entity's branches and/or subsidiaries	Yes / No * If no, please clarify which questions the difference/s relate to, explain the difference and identify the branch/es and/or subsidiary/ies that this applies to.
101.	If appropriate, provide any additional information/context to the answers in this section.	

9. PAYMENT TRANSPARENCY		
102.	Does the Entity adhere to: <ul style="list-style-type: none"> <li>Wolfsberg Group Payment Transparency Standards</li> <li>Due diligence and transparency regarding cover payment messages related to cross-border wire transfer issued by Basel Committee on Banking Supervision</li> </ul>	Yes / No *  Yes / No *
103.	Does the Entity have policies, procedures and processes to reasonably comply with and have controls in place to ensure compliance with:	
103.1	FATF Recommendation 16	Yes / No *  If no, please explain.
103.2	Local Regulations	Yes / No *  Please specify the local regulations.  If no, please explain.
104.	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes / No *
105.	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	Yes / No *
106.	Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?	Yes / No *
107.	Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the Entity's branches and/or subsidiaries	Yes / No *  If no, please clarify which questions the difference/s relate to, explain the difference and identify the branch/es and/or subsidiary/ies that this applies to.
108.	If appropriate, provide any additional information/context to the answers in this section.	

10. SANCTIONS		
109.	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions?	Yes / No *
110.	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 / No *
111.	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 / No *
112.	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?  <i>Sanctions Lists refers to any list specifically designated nationals or designated or sanctioned individuals or entities (or equivalent) issued by any governmental or international sanctions authority.</i>	Yes / No *
113.	What is the method used by the Entity?	<input type="checkbox"/> Automated <input type="checkbox"/> Manual <input type="checkbox"/> Combination of automated and manual
114.	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 / No *
115.	What is the method used by the Entity?	<input type="checkbox"/> Automated <input type="checkbox"/> Manual <input type="checkbox"/> Combination of automated and manual
116.	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
116.1	Consolidated United Nations Security Council Sanctions List (UN)	Yes / No *
116.2	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Yes / No *
116.3	Office of Financial Sanctions Implementation HMT (OFSI)	Yes / No *
116.4	European Union Consolidated List (EU)	Yes / No *
116.5	Lists maintained by other G7 member countries	Yes / No *
116.6	Other (specify)	Yes / No *
117.	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:	
117.1	Customer Data	<input type="checkbox"/> Same day to 2 business days <input type="checkbox"/> Within 3-5 business days <input type="checkbox"/> After 6 or more business days
117.2	Transactions	<input type="checkbox"/> Same day to 2 business days <input type="checkbox"/> Within 3-5 business days <input type="checkbox"/> After 6 or more business days

<b>118.</b>	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?  Answer "yes" if the Entity has a physical presence in any country which is included in any of the Sanctions Lists.	Yes / No *
<b>119.</b>	Confirm that all responses provided in the above Section SANCTIONS are representative of all the Entity's branches and/or subsidiaries	Yes / No *  If no, please clarify which questions the difference/s relate to, explain the difference and identify the branch/es and/or subsidiary/ies that this applies to.
<b>120.</b>	If appropriate, provide any additional information/context to the answers in this section.	

<b>11. COMPLIANCE AND REPUTATION</b>		
<b>121.</b>	Has the Entity received a visit from any regulator or supervising or enforcement body or any authorities in the jurisdictions the Entity operates and/or is incorporated in, in the past 5 years or since the last due diligence questionnaire's completion?	Yes / No *  If yes, did the regulator or authority have any material comments/findings in relation to AML/CTF? If yes, explain what they were related to, and the status of the relevant remedial actions?
<b>122.</b>	Does/Did the Entity have any pending/closed litigation for the last 5 years or since the last due diligence questionnaire for AML/CTF?	Yes / No *  If yes, please provide details.
<b>123.</b>	Is/ Was the Entity subject to any ongoing/ closed investigation or regulatory action by any regulator, supervising or enforcement body in connection with AML/CFT, market misconduct or in the last 5 years or since the last due diligence questionnaire for AML/CTF?	Yes / No *  If yes, please provide details.
<b>124.</b>	Is/ Was the Entity subject to any sanctions, targeted financial Sanctions, penalties, reprimand or any kind of enforcement actions in connection with AML/CFT in the last 5 years or since the last due diligence questionnaire for AML/CTF?	Yes / No *  If yes, please provide details.
<b>125.</b>	Does the Entity have all necessary regulatory permission in order to conduct activities in the jurisdictions where it intends to promote, offer, and/or sell any product or service?	Yes / No *
<b>126.</b>	Is the Entity compliant with the laws and regulations currently in force and applicable to it from an AML/CTF perspective?	Yes / No *
<b>127.</b>	Has the Entity or any of its predecessors conducted business under any other name during the last ten years?	Yes / No *  If yes, please provide a list of names as well as the background of the change.

<b>128.</b>	Is the Entity currently subject to any material negative media that the Correspondent Institution should be aware of?	Yes / No *  If yes, please provide details.
<b>129.</b>	Has the Entity's regular compliance monitoring, internal audit and/or risk management review led to any material findings in the last 3 years?	Yes / No *  If yes, please provide details.
<b>130.</b>	Confirm that all responses provided in the above Section COMPLIANCE AND REPUTATION are representative of all the Entity's branches and/or subsidiaries	Yes / No *  If no, please clarify which questions the difference/s relate to, explain the difference and identify the branch/es and/or subsidiary/ies that this applies to.
<b>131.</b>	If appropriate, provide any additional information/context to the answers in this section.	

<b>12. TRAINING &amp; EDUCATION</b>		
<b>132.</b>	Does the Entity provide mandatory training, which includes :	
<b>132.1</b>	Identification and reporting of transactions to government authorities	Yes / No *
<b>132.2</b>	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes / No *
<b>132.3</b>	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes / No *
<b>132.4</b>	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes / No *
<b>132.5</b>	Conduct and Culture (from a financial crime risk management perspective)	Yes / No *
<b>133.</b>	Is the above mandatory training provided to :	
<b>133.1</b>	Board and Senior Committee Management	Yes / No *
<b>133.2</b>	1st Line of Defence	Yes / No *
<b>133.3</b>	2nd Line of Defence	Yes / No *
<b>133.4</b>	3rd Line of Defence	Yes / No *
<b>133.5</b>	3rd parties to which specific FCC activities have been outsourced  <i>Answer "Yes" if the Entity provides training to such 3rd party or has oversight of the 3<sup>rd</sup> party's training programme and is comfortable that it complies with the Entity's requirements</i>	Yes / No / Not Applicable*
<b>133.6</b>	Non-employed workers (contractors/consultants)	Yes / No / Not Applicable *
<b>134.</b>	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes / No *

135.	Does the Entity provide customised training for AML, CTF and Sanctions staff (including all full time employees, as well as contractors and temporary staff, from both 1 <sup>st</sup> and 2 <sup>nd</sup> line of defence)?	Yes / No *
136.	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the ENTITY's branches and/or subsidiaries	Yes / No *  If no, please clarify which questions the difference/s relate to, explain the difference and identify the branch/es and/or subsidiary/ies that this applies to.
137.	If appropriate, provide any additional information / context to the answers in this section.	

### 13. QUALITY ASSURANCE / COMPLIANCE TESTING

138.	Are the Entity's KYC processes and documents subject to quality assurance testing?	
139.	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	
140.	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the Entity's branches and/or subsidiaries	Yes / No *  If no, please clarify which questions the difference/s relate to, explain the difference and identify the branch/es and/or subsidiary/ies that this applies to.
141.	If appropriate, provide any additional information / context to the answers in this section.	

### 14. AUDIT

142.	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF and Sanctions policies and practices on a regular basis?	
143.	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:	
143.1	Internal Audit Department	If only component based review/ thematic review is conducted, please specify and provide details.
143.2	External Independent Third Party	If only component based review/ thematic review is conducted, please specify and provide details.
144.	Does the internal audit function or other independent third party cover the following areas:	
144.1	AML, CTF & Sanctions policy and procedures	
144.2	KYC / CDD / EDD and underlying methodologies	
144.3	Transaction Monitoring	
144.4	Transaction Screening including for sanctions	
144.5	Name Screening & List Management	

<b>144.6</b>	Training & Education	
<b>144.7</b>	Technology	
<b>144.8</b>	Governance	
<b>144.9</b>	Reporting/Metrics & Management Information	
<b>144.10</b>	Suspicious Activity Filing	
<b>144.11</b>	Enterprise Wide Risk Assessment	
<b>144.12</b>	Other (specify)	
<b>145.</b>	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	
<b>146.</b>	Confirm that all responses provided in the above section, AUDIT are representative of all the Entity's branches and/or subsidiaries	Yes / No *  If no, please clarify which questions the difference/s relate to, explain the difference and identify the branch/es and/or subsidiary/ies that this applies to.
<b>147.</b>	If appropriate, provide any additional information / context to the answers in this section.	

### Declaration Statement

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 OR equivalent at branch/ subsidiary level (if this questionnaire is filled at branch/ subsidiary level))

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

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

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

The Financial Institution further certifies it complies with / is working to comply with the applicable principles, laws and regulations on AML/CFT applicable to the Financial Institution. The information provided in this due diligence questionnaire will be kept current and will be updated no less frequently than on an annual basis.

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

I, \_\_\_\_\_ (Head of Correspondent Banking or equivalent),  
certify that I have read and understood this declaration, that the answers provided in this due diligence questionnaire are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution (and its branches/ subsidiaries, where applicable).

I, \_\_\_\_\_ (MLRO or equivalent), certify that I have read  
and understood this declaration, that the answers provided in this due diligence questionnaire are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution (and its branches/ subsidiaries, where applicable).

\_\_\_\_\_  
(Signature & Date)

\_\_\_\_\_  
(Signature & Date)