



Financial Institution Name:

Location (Country) :

| No #                             | Question  | Answer |
|----------------------------------|---|--------|
| <b>1. ENTITY &amp; OWNERSHIP</b> |   |        |
| 1                                | Full Legal name   |        |
| 2                                | Append a list of foreign branches which are covered by this questionnaire (if applicable)         |        |
| 3                                | Full Legal (Registered) Address   |        |
| 4                                | Full Primary Business Address (if different from above)   |        |
| 5                                | Date of Entity incorporation / establishment  |        |
| 6                                | Select type of ownership and append an ownership chart if available                               |        |
| 6 a                              | Publicly Traded (25% of shares publicly traded)   |        |
| 6 a1                             | If Y, indicate the exchange traded on and ticker symbol   |        |
| 6 b                              | Member Owned / Mutual   |        |
| 6 c                              | Government or State Owned by 25% or more  |        |
| 6 d                              | Privately Owned   |        |
| 6 d1                             | If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more |        |
| 7                                | % of the Entity's total shares composed of bearer shares  |        |
| 8                                | Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?        |        |
| 8 a                              | If Y, provide the name of the relevant branch/es which operate under an OBL                       |        |

| 2. AML, CTF & SANCTIONS PROGRAMME |  |  |
|-----------------------------------|--|--|
| 9                                 | Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:        |  |
| 9 a                               | Appointed Officer with sufficient experience / expertise   |  |
| 9 b                               | Cash Reporting   |  |
| 9 c                               | CDD  |  |
| 9 d                               | EDD  |  |
| 9 e                               | Beneficial Ownership   |  |
| 9 f                               | Independent Testing  |  |
| 9 g                               | Periodic Review  |  |
| 9 h                               | Policies and Procedures  |  |
| 9 i                               | Risk Assessment  |  |
| 9 j                               | Sanctions  |  |
| 9 k                               | PEP Screening  |  |
| 9 l                               | Adverse Information Screening  |  |
| 9 m                               | Suspicious Activity Reporting  |  |
| 9 n                               | Training and Education   |  |
| 9 o                               | Transaction Monitoring   |  |
| 10                                | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? |  |
| 11                                | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?                           |  |
| 11a                               | If Y, provide further details  |  |

**3. ANTI BRIBERY & CORRUPTION**

|             |  |  |
|-------------|--|--|
| <b>12</b>   | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption? |  |
| <b>13</b>   | Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?  |  |
| <b>14</b>   | Does the Entity provide mandatory ABC training to:   |  |
| <b>14 a</b> | Board and Senior Committee Management  |  |
| <b>14 b</b> | 1st Line of Defence  |  |
| <b>14 c</b> | 2nd Line of Defence  |  |
| <b>14 d</b> | 3rd Line of Defence  |  |
| <b>14 e</b> | 3rd parties to which specific compliance activities subject to ABC risk have been outsourced   |  |
| <b>14 f</b> | Non-employed workers as appropriate (contractors / consultants)  |  |

**4. AML, CTF & SANCTIONS POLICIES & PROCEDURES**

|             |  |  |
|-------------|--|--|
| <b>15</b>   | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:     |  |
| <b>15 a</b> | Money laundering   |  |
| <b>15 b</b> | Terrorist financing  |  |
| <b>15 c</b> | Sanctions violations   |  |
| <b>16</b>   | Does the Entity have policies and procedures that:   |  |
| <b>16 a</b> | Prohibit the opening and keeping of anonymous and fictitious named accounts  |  |
| <b>16 b</b> | Prohibit the opening and keeping of accounts for unlicensed banks and / or NBFIs   |  |
| <b>16 c</b> | Prohibit dealing with other entities that provide banking services to unlicensed banks   |  |
| <b>16 d</b> | Prohibit accounts / relationships with shell banks   |  |
| <b>16 e</b> | Prohibit dealing with another Entity that provides services to shell banks   |  |
| <b>16 f</b> | Prohibit opening and keeping of accounts for Section 311 designated entities   |  |
| <b>16 g</b> | 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 |  |
| <b>16 h</b> | Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates  |  |
| <b>16 i</b> | Define escalation processes for financial crime risk issues  |  |
| <b>16 j</b> | Specify how potentially suspicious activity identified by employees is to be escalated and investigated  |  |
| <b>16 k</b> | Outline the processes regarding screening for sanctions, PEPs and negative media   |  |
| <b>17</b>   | Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?   |  |
| <b>18</b>   | Does the Entity have a record retention procedures that comply with applicable laws?   |  |
| <b>18 a</b> | If Y, what is the retention period?  |  |

| 5. KYC, CDD and EDD |  |  |
|---------------------|--|--|
| 19                  | Does the Entity verify the identity of the customer?   |  |
| 20                  | 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   |  |
| 21                  | Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:   |  |
| 21 a                | Ownership structure  |  |
| 21 b                | Customer identification  |  |
| 21 c                | Expected activity  |  |
| 21 d                | Nature of business / employment  |  |
| 21 e                | Product usage  |  |
| 21 f                | Purpose and nature of relationship   |  |
| 21 g                | Source of funds  |  |
| 21 h                | Source of wealth   |  |
| 22                  | Are each of the following identified:  |  |
| 22 a                | Ultimate beneficial ownership  |  |
| 22 a1               | Are ultimate beneficial owners verified?   |  |
| 22 b                | Authorised signatories (where applicable)  |  |
| 22 c                | Key controllers  |  |
| 22 d                | Other relevant parties   |  |
| 23                  | Does the due diligence process result in customers receiving a risk classification?  |  |
| 24                  | Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?   |  |
| 25                  | 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? |  |
| 26                  | Does the Entity have a process to review and update customer information based on:   |  |
| 26 a                | KYC renewal  |  |
| 26 b                | Trigger event  |  |

|              |   |  |
|--------------|---|--|
| <b>27</b>    | From the list below, which categories of customers or industries are subject to EDD and / or are restricted, or prohibited by the Entity's FCC programme? |  |
| <b>27 a</b>  | Non-account customers   |  |
| <b>27 b</b>  | Non-resident customers  |  |
| <b>27 c</b>  | Shell banks   |  |
| <b>27 d</b>  | MVTS/ MSB customers   |  |
| <b>27 e</b>  | PEPs  |  |
| <b>27 f</b>  | PEP Related   |  |
| <b>27 g</b>  | PEP Close Associate   |  |
| <b>27 h</b>  | Correspondent Banks   |  |
| <b>27 h1</b> | If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?               |  |
| <b>27 i</b>  | Arms, defense, military   |  |
| <b>27 j</b>  | Atomic power  |  |
| <b>27 k</b>  | Extractive industries   |  |
| <b>27 l</b>  | Precious metals and stones  |  |
| <b>27 m</b>  | Unregulated charities   |  |
| <b>27 n</b>  | Regulated charities   |  |
| <b>27 o</b>  | Red light business / Adult entertainment  |  |
| <b>27 p</b>  | Non-Government Organisations  |  |
| <b>27 q</b>  | Virtual currencies  |  |
| <b>27 r</b>  | Marijuana   |  |
| <b>27 s</b>  | Embassies / Consulates  |  |
| <b>27 t</b>  | Gambling  |  |
| <b>27 u</b>  | Payment Service Provider  |  |
| <b>27 v</b>  | Other (specify)   |  |
| <b>28</b>    | If restricted, provide details of the restriction   |  |

**6. MONITORING & REPORTING**

|             |   |  |
|-------------|---|--|
| <b>29</b>   | Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?                |  |
| <b>30</b>   | What is the method used by the Entity to monitor transactions for suspicious activities?  |  |
| <b>31</b>   | Does the Entity have regulatory requirements to report suspicious transactions?   |  |
| <b>31 a</b> | If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?                              |  |
| <b>32</b>   | Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? |  |

**7. PAYMENT TRANSPARENCY**

|              |   |  |
|--------------|---|--|
| <b>33</b>    | Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?   |  |
| <b>34</b>    | Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: |  |
| <b>34 a</b>  | FATF Recommendation 16  |  |
| <b>34 b</b>  | Local Regulations   |  |
| <b>34 b1</b> | Specify the regulation  |  |
| <b>34 c</b>  | If N, explain   |  |



**8. SANCTIONS**

|             |  |  |
|-------------|--|--|
| <b>35</b>   | 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? |  |
| <b>36</b>   | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?  |  |
| <b>37</b>   | Select the Sanctions Lists used by the Entity in its sanctions screening processes:  |  |
| <b>37 a</b> | Consolidated United Nations Security Council Sanctions List (UN)   |  |
| <b>37 b</b> | United States Department of the Treasury's Office of Foreign Assets Control (OFAC)   |  |
| <b>37 c</b> | Office of Financial Sanctions Implementation HMT (OFSI)  |  |
| <b>37 d</b> | European Union Consolidated List (EU)  |  |
| <b>37 e</b> | Lists maintained by other G7 member countries  |  |
| <b>37 f</b> | Other (specify)  |  |
| <b>38</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?   |  |

| 9. TRAINING & EDUCATION |   |  |
|-------------------------|---|--|
| <b>39</b>               | Does the Entity provide mandatory training, which includes :  |  |
| <b>39 a</b>             | Identification and reporting of transactions to government authorities  |  |
| <b>39 b</b>             | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered |  |
| <b>39 c</b>             | Internal policies for controlling money laundering, terrorist financing and sanctions violations  |  |
| <b>39 d</b>             | New issues that occur in the market, e.g., significant regulatory actions or new regulations  |  |
| <b>40</b>               | Is the above mandatory training provided to :   |  |
| <b>40 a</b>             | Board and Senior Committee Management   |  |
| <b>40 b</b>             | 1st Line of Defence   |  |
| <b>40 c</b>             | 2nd Line of Defence   |  |
| <b>40 d</b>             | 3rd Line of Defence   |  |
| <b>40 e</b>             | 3rd parties to which specific FCC activities have been outsourced   |  |
| <b>40 f</b>             | Non-employed workers (contractors / consultants)  |  |

**10. AUDIT**

|           |   |  |
|-----------|---|--|
| <b>41</b> | 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? |  |
|-----------|---|--|

**Signature Page**

Wolfsberg Group Financial Crime Compliance Questionnaire 2020 (FCCQ V1.1)

(Financial Institution name)

I, 

(Senior Compliance Manager- Second Line representative), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief.



(Signature & Date)