

Financial Institution Name: Location (Country) :

Frankfurter Bankgesellschaft (Schweiz) AG Schweiz

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, 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.

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No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	
		Frankfurter Bankman Washoff (Cabustin) A.O.
		Frankfurter Bankgesellschaft (Schweiz) AG
2	Append a list of foreign branches which are covered by	
2	this questionnaire	
	ti iis questiorinaire	n/a
3	Full Legal (Registered) Address	
		Börsenstrasse 16, 8001 Zürich, Schweiz
4	Full Primary Business Address (if different from above)	
		n/a
		Iva
5	Date of Entity incorporation/establishment	
2	and a second sec	
		19.01.1968
6	Select type of ownership and append an ownership chart	
	if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	
<u>6 b</u>	Member Owned/Mutual	No
<u>6 c</u>	Government or State Owned by 25% or more	
<u>6 d</u>	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	
	-	100 % Frankfurter Bankgesellschaft Holding AG
7	0/ of the Entitule total shares semposed of heaver shares	
1	% of the Entity's total shares composed of bearer shares	
		0%
8	Does the Entity, or any of its branches, operate under an	No
	Offshore Banking License (OBL)?	NO .
8 a	If Y, provide the name of the relevant branch/es which	
	operate under an OBL	
	, '	n/a
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	
		FINMA, Schweiz
		I INVIA, OCIWOIZ
11	Provide Legal Entity Identifier (LEI) if available	
-	3.5	
		5299004UAIQGGCLBCB46
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	Freelifi was Poeligoeelleekeft Helding AC
		Frankfurter Bankgesellschaft Holding AG
13	Jurisdiction of licensing authority and regulator of ultimate	
13		
	parent	Deutschland
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	No
14 b	Private Banking	Yes

14 c	Commercial Banking	No
14 d	Transactional Banking	No
14 e	Investment Banking	No
14 f	Financial Markets Trading	No
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	No
14 j	Wealth Management	Yes
14 k	Other (please explain)	
14 K	Other (picase explain)	
		n/a
		174
15	Does the Entity have a significant (10% or more) portfolio	
15		
	of non-resident customers or does it derive more than	
	10% of its revenue from non-resident customers? (Non-	Yes
	resident means customers primarily resident in a different	135
	jurisdiction to the location where bank services are	
	provided)	
15 a	If Y, provide the top five countries where the non-	Deutschland
	resident customers are located.	Luxemburg
	resident additinors are located.	Liechtenstein
		USA
		Paraguay
16	Select the closest value:	realaulay
		E4 200
<u>16 a</u>	Number of employees	51-200
16 b	Total Assets	
17	Confirm that all responses provided in the above Section	l
	are representative of all the LE's branches.	No
47 -	If N. clarify which appetions the difference/s relate to	
17 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
		n/a
18	If appropriate, provide any additional information/context	
	to the answers in this section.	
		n/a
2. PRODU	CTS & 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	
19 4 1 4		
40.4	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	
July	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)?	
10 0154	MSBs	No
19 a1h1		
19 a1h2	MVTSs	No .
19 a1h3	PSPs	No
19 a i i i s		

19 a1i	Does the Entity have processes and procedures in	
	place to identify downstream relationships with	
	MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	No
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No l
19 f	International Cash Letter	Yes
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then	
191		
	offer third party payment services to their customers?	No l
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	
	Virtual Asset Service Providers (VASPs)	
19 i3		
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	
1313	Other - Fiedde explain	
19 j	Private Banking	Both
	ŭ	
19 k	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	Yes
19 n	Trade Finance	No
19 o	Virtual Assets	No
19 p	For each of the following please state whether you	
iah		
	offer the service to walk-in customers and if so, the	
	applicable level of due diligence:	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	No l
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	
10 pou		
19 p4	Sale of Monetary Instruments	No
19 p4 19 p4a	Sale of Monetary Instruments If yes, state the applicable level of due diligence	
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19 p4 19 p4a 19 p5	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	No
19 p4 19 p4a	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including	No
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19 p4 19 p4 19 p5 19 q 20 20 a 21 3. AML, C 22 22 a 22 b	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	No n/a n/a No branches n/a n/a Yes Yes
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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,	
23		1-10
	CTF & Sanctions Compliance Department?	
24	Is the Entity's AML, CTF & Sanctions policy approved at	
	least annually by the Board or equivalent Senior	Yes
	Management Committee? If N, describe your practice in	i es
	Question 29.	
25	Does the Board receive, assess, and challenge regular	
23		Yes
	reporting on the status of the AML, CTF, & Sanctions	res
	programme?	
26	Does the Entity use third parties to carry out any	
	components of its AML, CTF & Sanctions programme?	No
	• •	
26 a	If Y, provide further details	
27	Doos the entity have a whiatlablower policy?	Yes
27	Does the entity have a whistleblower policy?	165
28	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	100
28 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
	and the braneries that this applies to.	n/a
		
	If appropriate provide any additional Co. Co. Co.	
29	If appropriate, provide any additional information/context	
	to the answers in this section.	
		n/a
4 ANTI DI	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and	Yes
	requirements to reasonably prevent, detect and report	i es
	bribery and corruption?	
04		
31	Does the Entity have an enterprise wide programme that	Yes
-	sets minimum ABC standards?	
32	Has the Entity appointed a designated officer or officers	
	with sufficient experience/expertise responsible for	Yes
	coordinating the ABC programme?	
20		
33	Does the Entity have adequate staff with appropriate	.,
	levels of experience/expertise to implement the ABC	Yes
	levels of experience/expertise to implement the ABC programme?	Yes
34	programme?	
34	programme? Is the Entity's ABC programme applicable to:	Yes Third parties acting on behalf of the Entity
35	programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that:	
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48 a U.S. Standards No 48 a1 If Y, does the Entity retain a record of the results? 48 b1 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 49 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs 49 c Prohibit dealing with other entities that provide banking services to unlicensed banks 49 d Prohibit dealing with another entity that provides services to shell banks 49 e Prohibit dealing with another entity that provides services to shell banks 49 f Prohibit opening and keeping of accounts for Section 311 designated entities 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 49 h Assess the risks of relationships with domestic and	48	Has the Entity chosen to compare its policies and	
48 a1 If Y, does the Entity retain a record of the results? 48 b EU Standards Yes 48 b1 If Y, does the Entity retain a record of the results? 49 Does the Entity have policies and procedures that: 49 a Prohibit the opening and keeping of anonymous and fictitious named accounts 49 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs 49 c Prohibit dealing with other entities that provide banking services to unlicensed banks 49 d Prohibit accounts/relationships with shell banks 49 d Prohibit dealing with another entity that provides services to shell banks 49 f Prohibit opening and keeping of accounts for Section 311 designated entities 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 49 h Assess the risks of relationships with domestic and		procedures against:	
48 b EU Standards 48 b 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 49 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs 49 c Prohibit dealing with other entities that provide banking services to unlicensed banks 49 d Prohibit accounts/relationships with shell banks 49 e Prohibit dealing with another entity that provides services to shell banks 49 f Prohibit opening and keeping of accounts for Section 311 designated entities 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 49 h Assess the risks of relationships with domestic and	48 a	U.S. Standards	No
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 49 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs 49 c Prohibit dealing with other entities that provide banking services to unlicensed banks 49 d Prohibit accounts/relationships with shell banks 49 e Prohibit dealing with another entity that provides services to shell banks 49 f Prohibit opening and keeping of accounts for Section 311 designated entities 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 49 h Assess the risks of relationships with domestic and	48 a1	If Y, does the Entity retain a record of the results?	
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49 c Prohibit dealing with other entities that provide banking services to unlicensed banks 49 d Prohibit accounts/relationships with shell banks 49 e Prohibit dealing with another entity that provides services to shell banks 49 f Prohibit opening and keeping of accounts for Section 311 designated entities 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 49 h Assess the risks of relationships with domestic and			Yes
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49 e Prohibit dealing with another entity that provides services to shell banks 49 f Prohibit opening and keeping of accounts for Section 311 designated entities 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 49 h Assess the risks of relationships with domestic and	49 d		Yes
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311 designated entities 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 49 h Assess the risks of relationships with domestic and	40 f		
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houses, casa de cambio, bureaux de change or money transfer agents 49 h Assess the risks of relationships with domestic and	49 <u>g</u>		
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49 h Assess the risks of relationships with domestic and			
	40.1		
L. Angeley DED - to alcology that to the fourth countries . IVan	49 h		Ven
foreign PEPs, including their family and close Yes			Tes .
associates		associates	I .

49 i	Define the process for escalating financial crime risk	
	issues/potentially suspicious activity identified by	Yes
	employees	1.33
49 j	Define the process, where appropriate, for terminating	
43)		Yes
	·	165
40.1	risk	
49 k	Define the process for exiting clients for financial	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	
	customers that were previously exited for financial	Yes
	crime reasons if they seek to re-establish a	165
	relationship	
49 m	Outline the processes regarding screening for	
	sanctions, PEPs and Adverse Media/Negative News	Yes
	, ,	
49 n	Outline the processes for the maintenance of internal	Yes
-	"watchlists"	
50	Has the Entity defined a risk tolerance statement or	
	similar document which defines a risk boundary around	Yes
	their business?	
51	Does the Entity have record retention procedures that	Yes
	comply with applicable laws?	100
51 a	If Y, what is the retention period?	
	· ·	
		5 years or more
52	Confirm that all responses provided in the above Section	No branches
	are representative of all the LE's branches	No brancies
52 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
		n/a
53	If appropriate, provide any additional information/context	
	to the answers in this section.	
6. AML, CTI	F & SANCTIONS RISK ASSESSMENT	
6. AML, CTI	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:	Yes
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes Voc
54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	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	Yes
54 a 54 b 54 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	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 effectiveness components detailed below:	Yes 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 effectiveness components detailed below: Transaction Monitoring	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 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
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
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
54 a 54 b 54 c 54 d 55 c 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 Training and Education Governance	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	Yes
54 a 54 b 54 c 54 d 55 c 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 Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in	Yes
54 a 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 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	Yes
54 a 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 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	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 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 555 b 55 c 55 d 55 e 55 f 55 g 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 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 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.	Yes
54 a 54 b 54 c 54 d 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 a 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 a 55 a 55 b 55 c 55 c 55 d 55 e 55 f 55 a 55 f 55 7 57 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 a 55 b 55 c 55 d 55 b 56 a 56 a 57 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 f 56 a 57 a 57 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	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 c 55 f 55 g 55 f 56 a 57 a 57 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	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 d 55 a 57 a 57 a 57 b 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 Goes 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 d 55 c 55 f 55 g 55 f 56 a 57 a 57 a 57 c 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
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 c 55 d 55 a 57 b 57 a 57 a 57 a 57 a 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
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 f 56 a 57 a 57 a 57 c 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 Governance List Management	Yes
54 a 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 c 55 d 55 e 55 f 56 a 57 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

	I N. O. :	Dr.
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	No branches
60 a	If N, clarify which questions the difference/s relate to	
00 a	and the branch/es that this applies to.	
	and the branchies that this applies to.	n/a
61	If appropriate, provide any additional information/context	
	to the answers in this section.	
		n/a
- 10/0 0	1500	
	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	
24	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	Yes
66	What is the Entity's minimum (lowest) threshold applied to	
00	beneficial ownership identification?	Other (Specify the percentage)
67	Does the due diligence process result in customers	
01	receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the	
0. u	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	
01 au	Outor (Speedily)	
		AuM
68	For high risk non-individual customers, is a site visit a part	Yes
	of your KYC process?	। एउ
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4	Other	No
68 a4a	If yes, please specify "Other"	
· · · ·	,, p,	
69	Does the Entity have a risk based approach to screening	
	customers for Adverse Media/Negative News?	Yes
	W. C	
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

	1	E.
69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	
74 a4	5 years or more	
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
75	33	Yes
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Do not have this category of customer or industry
76 b	Respondent Banks	Always subject to EDD
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	Do not have this category of customer or industry
76 d	Extractive industries	Do not have this category of customer or industry
76 e	Gambling customers	Always subject to EDD
76 f	General Trading Companies	Do not have this category of customer or industry
76 g	Marijuana-related Entities	Do not have this category of customer or industry
76 h	MSB/MVTS customers	Do not have this category of customer or industry
76 i	Non-account customers	Do not have this category of customer or industry
76 j	Non-Government Organisations	Always subject to EDD
76 k	Non-resident customers	Always subject to EDD
76 l	Nuclear power Payment Service Providers	Do not have this category of customer or industry
76 m 76 n	Payment Service Providers PEPs	Do not have this category of customer or industry Always subject to EDD
76 o	PEP Close Associates	Always subject to EDD
76 p	PEP Related	Always subject to EDD
76 a	Precious metals and stones	Do not have this category of customer or industry
76 r	Red light businesses/Adult entertainment	Do not have this category of customer or industry
76 s	Regulated charities	Always subject to EDD
76 t	Shell banks	Do not have this category of customer or industry
76 u	Travel and Tour Companies	Do not have this category of customer or industry
76 v	Unregulated charities	Do not have this category of customer or industry
76 w	Used Car Dealers	Do not have this category of customer or industry
76 x	Virtual Asset Service Providers	Do not have this category of customer or industry
76 y	Other (specify)	
77	If restricted, provide details of the restriction	
	Does EDD require senior business management and/or	
78	Dues EDD require serior business management and/or	Yes

70	If V is disease when are videoutle after an are velocity	
78 a	If Y indicate who provides the approval:	Both
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers,	Vec
	accountants, consultants, real estate agents?	Yes
80	Does the Entity perform an additional control or quality	
80	review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section	No horse share
	are representative of all the LE's branches	No branches
81 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
		n/a
82	If appropriate, provide any additional information/context	
	to the answers in this section.	
		n/a
O MONIT	ORING & REPORTING	
83	Does the Entity have risk based policies, procedures and	
33	monitoring processes for the identification and reporting	Yes
	of suspicious activity?	
84	What is the method used by the Entity to monitor	Automated
	transactions for suspicious activities?	Automateu
84 a	If manual or combination selected, specify what type	
	of transactions are monitored manually	
84 b	If automated or combination selected, are internal	Internal System
	system or vendor-sourced tools used?	mema System
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is	
	the name of the vendor/tool?	
84 b2	When was the tool last updated?	1-2 years
84 b3	When was the automated Transaction Monitoring	1-2 years
-	application last calibrated?	1-2 years
84 b3 85	application last calibrated? Does the Entity have regulatory requirements to report	1-2 years Yes
85	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions?	
-	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and	Yes
85	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction	
85	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and	Yes
85 85 a	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the	Yes
85 85 a	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes	Yes Yes
85 85 a	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management	Yes Yes Yes
85 a 85 a	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all	Yes Yes
85 85 a 86 87	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes Yes Yes
85 a 85 a	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to	Yes Yes Yes Yes
85 85 a 86 87	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a	Yes Yes Yes
85 85 a 86 87	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all 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?	Yes Yes Yes Yes
85 85 a 86 87	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all 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? Does the Entity have processes in place to send	Yes Yes Yes Yes
85 85 a 86 87	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all 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?	Yes Yes Yes Yes Yes Yes
85 85 a 86 87	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all 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? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section	Yes Yes Yes Yes Yes Yes Yes
85 85 a 86 87 88 89	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all 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? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes Yes Yes Yes Yes Yes
85 85 a 86 87 88	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all 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? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? 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 Yes Yes Yes Yes Yes Yes
85 85 a 86 87 88 89	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all 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? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes Yes Yes Yes Yes Yes Yes No branches
85 85 a 86 87 88 89	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all 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? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? 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 Yes Yes Yes Yes Yes Yes
85 85 a 86 87 88 89 90 90 a	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all 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? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? 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 Yes Yes Yes Yes Yes Yes No branches
85 85 a 86 87 88 89	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all 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? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? 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 Yes Yes Yes Yes Yes Yes No branches
85 85 a 86 87 88 89 90 90 a	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all 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? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? 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 Yes Yes Yes Yes Yes No branches n/a
85 85 a 86 87 88 89 90 90 a	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all 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? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? 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 Yes Yes Yes Yes Yes Yes No branches
85 85 a 86 87 88 89 90 90 a	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all 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? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? 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 Yes Yes Yes Yes Yes No branches n/a
85 85 a 86 87 88 89 90 90 a	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all 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? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? 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 Yes Yes Yes Yes Yes No branches n/a
85 85 a 86 87 88 89 90 90 a	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all 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? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? 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 Yes Yes Yes Yes Yes Yes No branches n/a
85 85 a 86 87 88 89 90 90 a	application last calibrated? Does the Entity have regulatory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have a data quality management programme to ensure that complete data for all 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? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? 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 Yes Yes Yes Yes Yes No branches n/a

93	Does the Entity have policies, procedures and processes	
	to comply with and have controls in place to ensure	
	compliance with:	
02.5	FATF Recommendation 16	Voc
93 a		Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	
		Schweizer GWG-Regelungen für den Zahlungsverkehr
93 c	If N, explain	
	, - 1	
94	Does the Entity have controls to support the inclusion of	
0-1	required and accurate originator information in cross	Yes
	border payment messages?	
0.5	Does the Entity have controls to support the inclusion of	
95		Yes
	required beneficiary information cross-border payment	Tes
	messages?	
95 a	If Y, does the Entity have procedures to include	
	beneficiary address including country in cross border	Yes
	payments?	
96	Confirm that all responses provided in the above Section	No branches
	are representative of all the LE's branches	No branches
96 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
	and and and and applied to.	n/a
97	If appropriate, provide any additional information/context	
J.	to the answers in this section.	
	to the answers in this section.	n/a
		100
10. SANCT	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	Yes
	business conducted with, or through accounts held at	
	foreign financial institutions?	
	<u> </u>	
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	Yes
	to the other entity (including prohibitions within the other	
	entity's local jurisdiction)?	
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	Yes
	sanctions relevant information in cross border	
	transactions?	
101	Does the Entity screen its customers, including beneficial	
	ownership information collected by the Entity, during	
		Yes
	onboarding and regularly thereafter against Sanctions	
	Lists?	
102	What is the method used by the Entity for sanctions	Both Automated and Manual
	screening?	
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,	
102 a 10	what is the name of the vendor/tool?	
	What is the hame of the vehicol/tool:	FINASTRA
102 a2	When did you last test the effectiveness (of finding	
. V. U.L	true matches) and completeness (lack of missing	
		1-2 years
	data) of the matching configuration of the	
	automated tool? (If 'Other' please explain in	
103	Does the Entity screen all sanctions relevant data,	
	including at a minimum, entity and location information,	Yes
	contained in cross border transactions against Sanctions	1.55
	Lists?	
104	What is the method used by the Entity?	Automated
105	Does the Entity have a data quality management	
	programme to ensure that complete data for all	Yes
		100
400	transactions are subject to sanctions screening?	
106	Select the Sanctions Lists used by the Entity in its	
	sanctions screening processes:	
106 a	Consolidated United Nations Security Council	Used for screening customers and beneficial owners (i.e. reference data)
	Sanctions List (UN)	Oscia for surcerning customers and penential owners (i.e. felefelice data)
106 b	United States Department of the Treasury's Office of	
	Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners (i.e. reference data)
106 c	Office of Financial Sanctions Implementation HMT	
100 0	(OFSI)	Not used
	(01 01)	

106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners (i.e. reference data)
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners (i.e. reference data)
106 e	Other (specify)	out of soldering sustainers and perional owners (i.e. reference data)
1001	5 (opoon))	
		SECO-Listen
407	M/hon regulator : - : th - : th-	
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	No
	G7 member countries have enacted comprehensive	
	jurisdiction-based Sanctions?	
109	Confirm that all responses provided in the above Section	Na branches
	are representative of all the LE's branches	No branches
109 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	-/-
		n/a
110	If appropriate, provide any additional information/context	
	to the answers in this section.	
		n/a
11 TD 415"	NG & EDUCATION	
11. TRAINI 111	Does the Entity provide mandatory training, which	
117	lincludes:	
111 a	Identification and reporting of transactions to	v
u	government authorities	Yes
111 b	Examples of different forms of money laundering,	
-	terrorist financing and sanctions violations relevant for	Yes
	the types of products and services offered	
111 c	Internal policies for controlling money laundering,	Yes
444.1	terrorist financing and sanctions violations	
111 d	New issues that occur in the market, e.g. significant	Yes
111 -	regulatory actions or new regulations	Voc
111 e 111 f	Conduct and Culture Fraud	Yes Yes
111 t 112	Is the above mandatory training provided to :	Yes
112 112 a	Board and Senior Committee Management	Yes
112 a	1st Line of Defence	Yes
112 b	2nd Line of Defence	Yes
112 d	3rd Line of Defence	No No
112 u	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	No branches

115 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
		n/a
116	If appropriate, provide any additional information/context	
110	to the answers in this section.	
	to the anomere in the decircin.	n/a
	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality	<u>, , , , , , , , , , , , , , , , , , , </u>
	Assurance programme for financial crime (separate from	Yes
118	the independent Audit function)? Does the Entity have a program wide risk based	
110	Compliance Testing process (separate from the	Yes
	independent Audit function)?	
119	Confirm that all responses provided in the above Section	No branches
-	are representative of all the LE's branches	NO DIARICHES
119 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	n/a
		Iva
120	If appropriate, provide any additional information/context	
	to the answers in this section.	
		n/a
13. AUDIT	<u> </u>	
121	In addition to inspections by the government	
	supervisors/regulators, does the Entity have an internal	
	audit function, a testing function or other independent	V
	third party, or both, that assesses FCC AML, CTF, ABC,	Yes
	Fraud and Sanctions policies and practices on a regular	
	basis?	
122	How often is the Entity audited on its AML, CTF, ABC,	
	Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Component based reviews
122 b	External Third Party	18 months
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and	
	procedures	Yes
123 b	Enterprise Wide Risk Assessment	
123 c	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e	Name Careening 9 Liet Management	Yes
4007	Name Screening & List Management	T es
123 f	Reporting/Metrics & Management Information	Yes
123 g	Reporting/Metrics & Management Information Suspicious Activity Filing	Yes Yes
123 g 123 h	Reporting/Metrics & Management Information Suspicious Activity Filing Technology	Yes Yes Yes
123 g 123 h 123 i	Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring	Yes Yes Yes Yes
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
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
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
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 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 g 123 h 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)	Yes Yes Yes Yes Yes Yes
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 Yes Yes Yes Yes Yes Yes Yes
123 g 123 h 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	Yes Yes Yes Yes Yes Yes
123 g 123 h 123 i 123 j 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 Yes Yes Yes Yes Yes Yes Yes
123 g 123 h 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	Yes Yes Yes Yes Yes Yes Yes Yes
123 g 123 h 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 Yes Yes Yes Yes Yes Yes Yes
123 g 123 h 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	Yes Yes Yes Yes Yes Yes Yes Yes Your state of the state
123 g 123 h 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 Yes Yes Yes Yes Yes Yes Yes
123 g 123 h 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 Yes Yes Yes Yes Yes Yes Yes Your state of the state
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123 g 123 h 123 j 123 j 123 k 123 l 124 125 125 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 Yes Yes Yes Yes Yes Yes Yes No branches
123 g 123 h 123 j 123 j 123 k 123 l 124 125 125 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 Yes Yes Yes Yes Yes Yes Yes No branches
123 g 123 h 123 j 123 j 123 k 123 l 124 125 125 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 Yes Yes Yes Yes Yes Yes Yes No branches
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123 g 123 h 123 j 123 j 123 k 123 l 124 125 125 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 Yes Yes Yes Yes Yes Yes Yes No branches n/a

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?	No
131	Confirm that all responses provided in the above section are representative of all the LE's branches	No branches
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	n/a
132	If appropriate, provide any additional information/context to the answers in this section.	n/a

Declaration 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)

Frankfurter Bankgesellschaft (schweiz) AG 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 the Wolfsberg Correspondent Banking 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.

I, Andrea Dankert (COO), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

I, Hendrik Lange (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.

25.02.2025	 (Signature & Date)
25.02.2025	 (Signature & Date)