the Wolfsberg Group

Financial Institution Name: Location (Country) :

MUFG Bank (Europe) N.V. The Netherlands

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

No#	Question	Answer
	· · · · · · · · · · · · · · · · · · ·	VIISMEI
1. ENITIY	& OWNERSHIP	
1	Full Legal Name	MUFG Bank (Europe) N.V.
_		
2	Append a list of foreign branches which are covered	MUFG Bank (Europe) N.V., Austria Branch, Belgium Branch, Germany Branch, Spain Branch
	by this questionnaire	
3	Full Legal (Registered) Address	World Trade Center Amsterdam (I Tower 5th Floor)
		Strawinskylaan 1887, 1077XX Amsterdam, the Netherlands
4	Full Primary Business Address (if different from	
	above)	
5	Date of Entity incorporation/establishment	01/06/1972
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	
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate	100% owned by MUFG Bank Ltd., which is 100% owned by Mitsubishi UFJ Financial Group, Inc
	beneficial owners with a holding of 10% or more	(Ticker for NYSE: MUFG, TSE: 8306)
7	% of the Entity's total shares composed of bearer	0% bearer shares
	shares	on sould shallo
8	Does the Entity, or any of its branches, operate under	No
	an Offshore Banking License (OBL)?	INO
8 a	If Y, provide the name of the relevant branch/es	
	which operate under an OBL	
9	Does the Bank have a Virtual Bank License or	Ma
	provide services only through online channels?	No
10	Name of primary financial regulator/supervisory	De Nederlandsche Bank
	authority	50 Hodestandono Bunk
11	Provide Legal Entity Identifier (LEI) if available	724500Q03K04L0479N30
		12T000Q001\04L04131100
12	Provide the full legal name of the ultimate parent (if	Mitauhiahi HE I Financial Croup, Inc.
	different from the Entity completing the DDQ)	Mitsubishi UFJ Financial Group, Inc.
	I .	1

14 Sele 14 a Re 14 b Pr 14 c Co 14 d Tr	risdiction of licensing authority and regulator of	
14 Sels 14 a Re 14 b Pr 14 c Co 14 d Tr		Japan
14 a Re 14 b Pr 14 c Co 14 d Tr	mate parent	Vapan
14 a Re 14 b Pr 14 c Co 14 d Tr		
14 a Re 14 b Pr 14 c Co 14 d Tr		
14 a Re 14 b Pr 14 c Co 14 d Tr		
14 a Ref 14 b Pr 14 c Co 14 d Tr	lect the business areas applicable to the Entity	
14 b Pr 14 c Co 14 d Tr	Retail Banking	No
14 c Co	9	
14 d Tra	Private Banking	No
	Commercial Banking	Yes
	ransactional Banking	Yes
14 e In	9	
	nvestment Banking	No
14 f Fir	inancial Markets Trading	Yes
14 g Se	Securities Services/Custody	No
_	Broker/Dealer	No
	fultilateral Development Bank	No
14 j W	Vealth Management	No
14 k Ot	Other (please explain)	
	,	
port mor cust resi	es the Entity have a significant (10% or more) rtfolio of non-resident customers or does it derive ore than 10% of its revenue from non-resident stomers? (Non-resident means customers primarily sident in a different jurisdiction to the location ere bank services are provided)	No
	Y, provide the top five countries where the non- esident customers are located.	
16	locatitho allocativolus:	
	lect the closest value:	
16 a Nu	lumber of employees	501-1000
16 b To	otal Assets	Greater than \$500 million
	nfirm that all responses provided in the above	
Sec	ction are representative of all the LE's branches.	Yes
	N, clarify which questions the difference/s relate to nd the branch/es that this applies to.	
	ppropriate, provide any additional propriate, provide any additional provide answers in this section.	
2. PRODUCTS	S & SEDVICES	
	es the Entity offer the following products and	
serv	vices:	
	rrespondent Banking	No
19 a Cor	· -	
19 a1 If \	Does the Entity offer Correspondent Banking	
19 a1 If \\ 19 a1a [services to domestic banks?	No
19 a1 If \(\) 19 a1a \(\) 19 a1b \(\)	Does the Entity allow domestic bank dients to provide downstream relationships?	No No
19 a1 If 19 a1a	Does the Entity allow domestic bank dients to	
19 a1 If \(\) 19 a1a \(\) 19 a1b \(\) 19 a1c \(\) 19 a1d \(\) 19 a1d \(\)	Does the Entity allow domestic bank dients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with	No
19 a1 If \(\) 19 a1a \(\) 19 a1b \(\) 19 a1c \(\) 19 a1c \(\) 19 a1d \(\) 19 a1d \(\) 19 a1d \(\) 19 a1e \(\)	Does the Entity allow domestic bank dients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking	No No
19 a1	Does the Entity allow domestic bank dients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships	No No
19 a1 If \	Does the Entity allow domestic bank dients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with	No No No
19 a1 If \	Does the Entity allow domestic bank dients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	No No No No No
19 a1 If \	Does the Entity allow domestic bank dients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	No No No No No
19 a1	Does the Entity allow domestic bank dients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	No No No No No No No No
19 a1 If \	Does the Entity allow domestic bank dients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	No No No No No No

10 01:		
19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	No
19 b	Cross-Border Bulk Cash Delivery	No
19 с	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No
19 f	International Cash Letter	No
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may	
	then offer third party payment services to their customers?	No
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	No
19 i3	Virtual Asset Service Providers (VASPs)	No
19 i4	eCommerce Platforms	No
19 i5	Other - Please explain	
	·	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 m	Trade Finance	
		Yes
19 o	Virtual Assets	No
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	Please select
19 p2	Wire transfers	No No
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p3	Foreign currency conversion	No No
19 p3a	If yes, state the applicable level of due diligence	
		Please select
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	Please select
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by	No
	the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
20 20 a	Confirm that all responses provided in the above	Yes
	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
20 a	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
20 a	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. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum	Yes
20 a 21 3. AML, C 22	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. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
20 a 21 3. AML, C 22	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. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient	Yes
20 a 21 3. AML, C 22 22 a 22 b	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. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening	Yes Yes
20 a 21 3. AML, C 22	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. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient	Yes
20 a 21 3. AML, C 22 22 a 22 b	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. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening	Yes Yes
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d	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. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information formation standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting	Yes Yes Yes Yes Not applicable
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 e	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. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD	Yes Yes Yes Yes Not applicable Yes
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 c 22 c 22 f	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. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	Yes Yes Yes Yes Yes Yes Not applicable Yes Yes
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g	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. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Yes Yes Yes Yes Yes Not applicable Yes Yes Yes Yes
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	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. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Yes Yes Yes Yes Yes Yes Not applicable Yes Yes
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g	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. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Yes Yes Yes Yes Yes Not applicable Yes Yes Yes Yes
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	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. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Yes Yes Yes Yes Not applicable Yes Yes Yes Yes Yes
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 j	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. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Yes Yes Yes Yes Yes Not applicable Yes Yes Yes Yes Yes Yes Yes Yes Yes
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i	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. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes

22 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, CTF & Sanctions Compliance Department?	11-100
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Yes
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes
26 a	If Y, provide further details	Some activities are carried out by MUFG Group companies.
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	Q22d - No cash business is accepted, therefore Cash Reporting is not applicable. Q23 - This number includes First Line staff performing relevant activities.
4. ANTI E	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes

Comption raise seccised with the countries and enderson which the Entity does business, directly on through intermediations, and control or enderson, including those or public directions, and control or endersons, including those or public directions and policial control or enderson and procedures and proc	40 5		
that involve size subservance for state-controlled entities or position officials of position of ficials of hospitality, hinging financials, chartisate denotions and political contributions. 40 Congress the Entity's Controlled and Services that many materially increases the Entity's Controlled and Services that many materially increases the Entity's Controlled and Services that many materially increases the Entity's Controlled and Services that Services and Procedures? 42 Conset the Entity's Controlled and Services and Procedures? 43 Board and sonic Committee Management visa 1 Services and Procedures? 44 Description of Committee Management visa 2 Services and Services	40 6	industries in which the Entity does business, directly	Yes
As a company of the company and the company and the company and the company and political contributions of the company and political contributions and engineering to the contributions of the company and political contributions and engineering to the contributions and engineering to company and political contributions and engineering to contributions and engineering to contr	40 c	that involve state-owned or state-controlled entities	Yes
Changes in business activities that may materially increase the Entity countpot risk increase the Entity cover ABC Policies and independent intrip aprice work ABC Policies and Procedures? 42 Description of the Entity service of the Entity se	40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations	Yes
The content of the co	40 e	Changes in business activities that may materially	Ves
Independent hint party cover ASC Pelicies and Procedures? 42 a Board and senior Committee Management	41		
Section		independent third party cover ABC Policies and	Yes
42 c. 2 Aut Line of Defence Yes 42 d. 3rd Line of Defence Yes 3ubject to ABC risk have been culsourced 42 f. Non-employed workers as appropriate (contractors/consultaris) 42 f. Non-employed workers as appropriate (contractors/consultaris) 43 Dees he Erithy provide ABC training that is targeted to specific notes, responsibilities and activities? 44 Confirm that all response provided in the &E's branches Section are exposentiative of all the &E's branches 44 a. If A, Carlfy which questions the difference's relate to and the branch/es that this applies to. 45 If appropriate, provide any additional information/context to the answers in this section. 46 If a more provided any additional information/context to the answers in this section. 55. AML, CTF & SANCTIONS POLICIES & PROCEDURES 46 If as the Entity documented policies and procedures consistent with applicable AML, CTF & Sanchons regulations and requirements to reasonably prevent, detect and report. 46 a Money leundering Yes 46 b Terrorist financing Yes 47 Are the Entity's policies and procedures updated at least annually? 48 Has the Entity chosen to compare its policies and procedures updated at least annually? 48 If the Entity specifice is and procedures updated at least annually? 48 If the Entity chosen to compare its policies and procedures against the Section of the results? 48 a. U.S. Standards 49 a. U.S. Standards 40 EVENTIAL observable in a record of the results? 40 Does the Entity have policies and procedures that the Section of the results? 41 If Y, does the Entity retain a record of the results? 42 Prohibit depenieng and keeping of accounts for uniconsed banks and/or NBFIs 40 Prohibit depenieng and keeping of accounts for uniconsed banks and/or NBFIs 41 Prohibit depenieng and keeping of accounts for any order of the prohibit depenieng and keeping of accounts for any order or any practice and procedures that the prohibit depenieng and keeping of accounts for an	42	Does the Entity provide mandatory ABC training to:	
42 d. 3 d. Line of Defence 42 d. 3 value of Defence 5 subject to ABC risk have been outsoured session subject to ABC risk have been outsoured so openfic roiles, responselablities and activities? 43 Dees the Entity provide ABC training that is torgeted to openfic roiles, responselablities and activities? 44 a Till, darify which questions the difference's relate to and the branchées that this applies to. 45 If appropriate, provide any additional information/context to the answers in this section. 45 If appropriate, provide any additional information/context to the answers in this section. 55 AML, OTF & SANCTIONS POLICIES & PROCEDURS 46 If as the Entity documented policies and procedures consistent with applicable AML, OTF & Sanctions regulations and requirements to reasonably prevent, detect and report 46 A Money Bundering Yes 46 B Money Bundering Yes 46 C Sanctions violations Yes 47 Are the Entity's policies and procedures updated at least annually? 48 Les the Entity thosen to compare its policies and procedures against: 49 A The Topic of the Entity retain a record of the results? 49 A The Topic of the Entity retain a record of the results? 49 A Prohibit depending and keeping of accounts for unificensed banks and/or MSIPs 49 A Prohibit depending and keeping of accounts for unificensed banks and/or MSIPs 49 Prohibit depending with online rentities that provide banking services to unificensed banks and or provides services to sell banks 49 Prohibit depending with online rentities that provide banking services to unificensed banks and or provides services to sell banks 49 Prohibit depending and keeping of accounts for Section 311 designation ships with shell banks		Board and senior Committee Management	Yes
42 e Trit parties to which specific compliance activities subject to ABC risk have been outsourced subject to ABC risk have been outsourced (contractors/consultants) 42 f Does he Entity provide ABC training that is targeted to specific rotes, responsibilities and activities? 43 Does he Entity provide ABC training that is targeted by specific rotes, responsibilities and activities? 44 Confirm that all responses provided in the above Section are representative of all the LEs branches 44 a If N, darify which questions the difference's relate to and the branchies that this applies to. 45 If appropriate, provide any additional information/context to the answers in this section. 5 AML, CTF & SANCTIONS POLICIES & PROCEDURS 46 If appropriate, provide any additional information/context to the answers in this section. 5 AML, CTF & SANCTIONS POLICIES & PROCEDURS 46 If appropriate, provide any additional information/context to the answers in this section. 46 a Money laundering Vest consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report. 46 a Money laundering Vest Sanctions volusions of Vest Sanctions volusions of Vest Sanctions volusions of Vest Sanctions volusions Vest Sanctions volusions Vest Sanctions volusions of Vest Sanctions volusions of Vest Sanctions volusions volusions of Vest Sanctions volusions of Vest Sanctions volusions of Vest Sanctions volusions of Vest Sanctions volusions vo	42 b		Yes
42 f. Third parties to which specific compliance activities subject to ABC fish, have been outsourced to specific roles, responsibilities and activities? 43 Does the Entity provide ABC staining that is targeted to specific roles, responsibilities and activities? 44 Confirm that all responses provided in the above Section are representative of all the LE branches Section are representative of all the LE branches and the branchies that this applies to, 45 If appropriate, provide any additional informationohorizy to the answers in this section. 45 If appropriate, provide any additional informationohorizy to the answers in this section. 46 If appropriate, provide any additional informationohorizy to the answers in this section. 55 AMIL, CTF & SANCTIONS POLICIES & PROCEDURES 46 Has the Entity documented policies and procedures consistent with applicable AMIL, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report. 46 a. Money laundering Yes 47 Are intrivial stainaring Yes 48 Take Entity spolicies and procedures updated at least annually? 48 a. Money laundering Yes 48 Take Entity chosen to compare its policies and procedures against. 48 a. L.S. Sandards 48 a. L.S. Sandards 49 B. EU Sandards 40 Prohibit deeling and keeping of accounts for unicensed banks and or with self-provide banks and or Wallship and keeping of accounts for unicensed banks and or with self-provide banks and or Prohibit deeling and keeping of accounts for suricensed banks and or Prohibit deeling and keeping of accounts for suricensed banks and or Haribit accompanies and provides and procedures and technical sands and the prohibit deeling and keeping of accounts for suricensed banks and or Haribit accompanies and the provides and propenies and keeping of accounts for suricensed banks and or Prohibit deeling with another entity that provides services to entitle banks. 49 Prohibit deeling with another entity that provides survives to entity and the provides and foreign Previous to the provide and the pro	42 c	2nd Line of Defence	Yes
subject to ABC risk have been outbourced 22 f Non-employed workers as appropriate (contractors/consultants) 43 Does the Entity provide ABC training that is tropted to a pecific roles, responsibilities and activities? 44 Confirm that all responses provided in the above Section are representative of all the LE's branches 44 a If N, darify which questions the difference's relate to and the branchies that this applies to. 45 If appropriate, provide any additional information/context to the answers in this section. 5 AML, CTF & SANCTIONS POLICIES & PROCEDURES 46 If appropriate, provide any additional information/context to the answers in this section, 5 AML, CTF & SANCTIONS POLICIES & PROCEDURES 46 If a Money laundering Yes that the feet of the provide any additional reputations and requirements to reasonably prevent, detect and report. 46 a Money laundering Yes Sanctions violations by the Entity spolicies and procedures updated at least annually? 48 Has the Entity spolicies and procedures updated at least annually? 49 Has the Entity spolicies and procedures updated at least annually? 48 a U.S. Standards 49 Destinating the provide any additional information and procedures against. 49 Destinating Yes Sanctions violations Yes Sanctions violations on the Entity spolicies and procedures and forcedures updated at least annually? 49 Destinating Yes Sanctions violations Yes Sanctions violations on the Entity spolicies and procedures that least annually? 49 Destinating Sanctions of the Trip they provide any additions and an additions annaer and additions annaer and accounts of the sanctions and additions annaer and accounts of the prohibit the opening and keeping of accounts for undersead banks and officilious name and or NBFIs Prohibit dealing with another entity that provide banking services to undicensed banks and or NBFIs Prohibit dealing with another entity that provide banking services to undicensed banks or Ages Sanction 31 designate entities to agent, exchange thouse, case de cambio, bureaux de chan			Yes
Contractors/consultants Yes		subject to ABC risk have been outsourced	No
to specific roles, responsibilities and activities? 44 Confirm that all responses provided in the above Section are representative of all the LE's branches 45 If N, darify which questions the difference's relate to and the branchies that this applies to. 45 If appropriate, provide any additional information/context to the answers in this section. 5. AML, CTF & SANCTIONS POLICIES & PROCEDURES 46 Has the Entity documented policies and procedures consistent with applicable MM, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report. 46 Money Journdering Yes 46 Money Journdering Yes 46 Sanctions violations 47 Are the Entity's policies and procedures updated at least annually? 48 Has the Entity closen to compare its policies and procedures applications. 48 a U.S. Standards 48 a U.S. Standards 48 a U.S. Standards 48 a If Y, does the Entity retain a record of the results? Yes 48 b If 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 accounts for unlicensed banks and of NBFIs 49 e Prohibit dealing with other entities that provide banks yes 49 e Prohibit dealing with other entities that provide services of the services of the prohibit countries of the services of the services of the services of the prohibit countries of banks and or NBFIs 49 e Prohibit dealing with other entities that provide services to shell banks 49 e Prohibit dealing with other entities that provide services to shell banks 49 e Prohibit dealing with other entities that provide services to shell banks 49 e Prohibit dealing with other entities that provide services to shell banks 49 e Prohibit dealing with other entities that provide services to shell banks 49 e Prohibit dealing with other entities that provide services to shell banks 49 e Prohibit dealing with other entities that provide services to shell banks 49 e Prohibit dealing with other entities that provide services to shell banks 49		(contractors/consultants)	Yes
Section are representative of all the LE's branches If N, darify 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. EWRA is organised at a MUFG Group level. FEWRA is organised at a MUFG Group level. FWRA is organised at a MUFG Group level. FWRA is organised at a MUFG Group level. EWRA is organised at a MUFG Group level. EWRA is organised at a MUFG Group level. FWRA is organised at a MUFG Group level. EWRA is organised at a MUFG Group level. FWRA is organised at a MUFG Group level		to specific roles, responsibilities and activities?	Yes
and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. EWRA is organised at a MUFG Group level. Fore a consistent with applicate and proceedures proceedures on a more and a proceedures and proceedures and procedures and proceedures and fections animal and proceedures and proceedures and proceedures and fections animal and proceedures and proceedures and fections animal proceedures and fections animal proceedures and proceedures and proceedures and fections animal proceedures and proceedures		Section are representative of all the LE's branches	Yes
information/context to the answers in this section. EVMA is organised at a MUFG Group level. EVAT Comment of the street of the second of the	44 a		
Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 46 a Money laundering Yes 46 b Terrorist financing Yes 46 c Sanctions violations Yes 47 Are the Entity's policies and procedures updated at least annually? 48 Has the Entity chosen to compare its policies and procedures against: 48 a U.S. Standards Yes 48 a If Y, does the Entity retain a record of the results? 48 b EU Standards Yes 48 b EU Standards Yes 48 b 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 accounts for unilcensed banks and/or NBFIs 49 c Prohibit dealing with other entities that provide banking services to unlicensed banks 49 c Prohibit dealing with other entities that provide services to shell banks 49 c Prohibit opening and keeping of accounts for Section 311 designated entities 49 c Prohibit opening and keeping of accounts for Section 311 designated entities 49 c Prohibit opening and keeping of accounts for Section 311 designated entities 49 c Prohibit opening and keeping of accounts for Section 311 designated entities 49 c Prohibit opening and keeping of accounts for Section 311 designated entities 49 c Prohibit opening and keeping of accounts for Section 311 designated entities 49 c Prohibit opening and keeping of accounts for Section 311 designated entities 49 c Prohibit opening and keeping of accounts for Section 311 designated entities 49 c Prohibit opening and keeping of accounts for Section 311 designated entities 49 c Prohibit opening and keeping of accounts for Section 311 designated entities 49 c Prohibit opening and keeping of accounts for Section 311 designated entities 49 c Prohibit opening and keeping of accounts for Section 311 designated entities 49 c Prohibit opening and keeping of accounts for Section 311 designated entities 49 c Prohibit opening and keeping of accounts for Section 311 designated entities 49 c	45		EWRA is organised at a MUFG Group level.
Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 46 a Money laundering Yes 46 b Terrorist financing Yes 46 c Sanctions violations Yes 47 Are the Entity's policies and procedures updated at least annually? 48 Has the Entity chosen to compare its policies and procedures against: 48 a U.S. Standards Yes 48 at If Y, does the Entity retain a record of the results? Yes 48 b EU Standards Yes 48 b EU Standards Yes 49 Does the Entity have policies and procedures that: 49 a Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs 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 other entities 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 Section 311 designated entities 49 g Prohibit opening and keeping of accounts for Section 311 designated entities 49 g Prohibit opening and keeping of accounts for Section 311 designated entities 49 g Prohibit opening and keeping of accounts for Section 311 designated entities 49 g Prohibit opening and keeping of accounts for Section 311 designated entities 49 g Prohibit opening and keeping of accounts for Section 311 designated entities 49 g Prohibit opening and keeping of accounts for Section 311 designated entities 49 g Prohibit opening and keeping of accounts for Section 311 designated entities 49 g Prohibit opening and keeping of accounts for Section 311 designated entities 49 g Prohibit opening and keeping of accounts for Section 311 designated entities 49 g Prohibit opening and keeping of accounts for Section 311 designated entities 49 g Prohibit opening and keeping of accounts for Section 311 designated entities	5 AMI C	TE & SANCTIONS DOLICIES & DROCEDURES	
consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 46 a			
46 b Terrorist financing Yes 46 c Sanctions violations Yes 47 Are the Entity's policies and procedures updated at least annually? 48 Has the Entity chosen to compare its policies and procedures against: 48 a U.S. Standards 48 a1 If Y, does the Entity retain a record of the results? Yes 48 b1 If Y, does the Entity retain a record of the results? Yes 48 b2 EU Standards 49 Does the Entity retain a record of the results? 49 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 opening and keeping of accounts for Section 311 designated entities 49 f Prohibit opening and keeping of accounts for Section 311 designated entities 49 g Prohibit opening and keeping of accounts for Section 311 designated entities 49 f Assess the risks of relationships with domestic and foreign PEPs, including their family and close 49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close 49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close	140		
46 c Sanctions violations Yes 47 Are the Entity's policies and procedures updated at least annually? 48 Has the Entity chosen to compare its policies and procedures against: 48 a U.S. Standards Yes 48 b I If Y, does the Entity retain a record of the results? Yes 48 b I 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 other 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 Section 311 designated entities 49 g Prohibit opening and keeping of accounts for Section 311 designated entities 49 g Are the Entity spolicies and procedures updated updated and procedures updated up		consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent,	
Are the Entity's policies and procedures updated at least annually? 48 Has the Entity chosen to compare its policies and procedures against: 48 a U.S. Standards 48 a If'Y, does the Entity retain a record of the results? Yes 48 b EU Standards 48 b If'Y, does the Entity retain a record of the results? Yes 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 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 foreign PEPs, including their family and close Yes	46 a	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	Yes
least annually?		consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering	
procedures against: 48 a U.S. Standards 48 a1 If Y, does the Entity retain a record of the results? 48 b1 EU Standards 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 e 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 foreign PEPs, including their family and close Yes	46 b	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing	Yes
48 a1	46 b 46 c	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at	Yes Yes
48 b EU Standards Yes 48 b1 If Y, does the Entity retain a record of the results? Yes 49 Does the Entity have policies and procedures that: 49 a Prohibit the opening and keeping of anonymous and fictitious named accounts 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 foreign PEPs, including their family and close Yes	46 b 46 c 47	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and	Yes Yes
Section 311 designated entities Prohibit opening and keeping of accounts for Section 311 designated entities	46 b 46 c 47	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against:	Yes Yes Yes
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 foreign PEPs, including their family and close Yes	46 b 46 c 47 48	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards	Yes Yes Yes Yes Yes
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 foreign PEPs, including their family and close Yes	46 b 46 c 47 48 48 a 48 a	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes Yes Yes Yes
and fictitious named accounts 49 b	46 b 46 c 47 48 48 a 48 a 48 a 48 b	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes Yes Yes Yes Yes Yes Yes
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 foreign PEPs, including their family and close Yes Yes	46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes Yes Yes Yes Yes Yes Yes
banking services to unlicensed banks 49 d	46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b 49	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous	Yes
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 foreign PEPs, including their family and close Yes Yes	46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b 49 a	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
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 foreign PEPs, including their family and close Yes Yes	46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b 49 a 49 b	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
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 foreign PEPs, including their family and close Yes Yes	46 b 46 c 47 48 48 a 48 a 48 a1 48 b 48 b 49 a 49 c	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
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 foreign PEPs, including their family and close Yes	46 b 46 c 47 48 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides	Yes
foreign PEPs, including their family and close Yes	46 b 46 c 47 48 48 48 a 48 a 48 b 48 b 49 b 49 c 49 c 49 d 49 e	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Poes the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for unlicensed banks	Yes
decorated	46 b 46 c 47 48 48 a 48 a 48 a1 48 b1 49 49 a 49 b 49 c 49 d 49 e	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de	Yes Yes

49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
49 I	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes
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 "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	5 years or more
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context to the answers in this section.	Q48a1 - Assessments are typically carried out at MUFG Group level.
6. AML. CTF	& SANCTIONS RISK ASSESSMENT	
6. AML, CTF 54	& SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
	Does the Entity's AML & CTF EWRA cover the	Yes
54 54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Yes 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 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 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
54 a 54 b 54 c 54 d 55 d 55 d 55 a 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 Customer Due Diligence	Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 c 55 a 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 d 55 a 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 Customer Due Diligence	Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 55 d 55 a 55 c 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative	Yes
54 a 54 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 5 5 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 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?	Yes
54 a 54 b 54 c 54 d 55 5 5 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	Yes
54 a 54 a 54 b 54 c 54 d 55 a 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 EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 56 a 56 a 57	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 56 a 57 a 57 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 b 54 c 54 d 55 5 5 a 55 b 55 c 55 d 55 e 55 f 56 a 57 a 57 b 57 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
54 a 54 b 54 c 54 d 55 5 5 a 55 b 55 c 55 d 55 c 55 d 55 6 a 56 a 57 a 57 b 57 c 57 d 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 b 54 c 54 d 55 5 5 a 55 c 55 d 55 c 55 d 55 c 55 f 55 d 55 c 55 f 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: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a 57 a 57 a 57 d 58 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
54 a 54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 6 a 56 a 57 a 57 a 57 b 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
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a 57 a 57 a 57 a 57 d 58 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes

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 last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional	
	information/context to the answers in this section.	
7. KYC, CE	DD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e 64 f	Product usage Purpose and nature of relationship	Yes
64 g	Source of funds	Yes 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 с	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	10%
67	Does the due diligence process result in customers receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3 67 a4	Business Type/Industry Legal Entity type	Yes
67 a4 67 a5	Adverse Information	Yes Yes
67 a6	Other (specify)	
		Delivery Channel
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes
68 a	If Y, is this at:	N.
68 a1 68 a2	Onboarding KYC renewal	Yes
68 a3	Trigger event	Yes Yes
68 a4	Other	No No
68 a4a	If yes, please specify "Other"	
69 69 a	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes
69 a1	If Y, is this at: Onboarding	Voe
69 a1	KYC renewal	Yes
09 az	N 10 renewal	Yes

Figure and Company C			
Authorises Medialinegative News2 71 Does the Entity wave an Entity taxous and staked approach to scienting customers and committed parties to determine whether they are EPPs, or controlled y EPPs? 71 Tax Bits at a FY, a bits at 1 FY, and the stake of the	69 a3	Trigger event	Yes
Accesses Media/Angelive News2 7 Does no Entity here an internal based approach to screening customers and connected parties to determine whether hery are PEPs, or controlled by PEPs? 7 a BY, is this at a BY, is this at a SY, is this at the Controlled by PEPs? 7 a BY, is this at the media due to be the Entity to screen PEPs? 7 a What is the media due to by the Entity to screen PEPs? 7 a What is the media due to by the Entity to screen PEPs? 7 a What is the media due to by the Entity to screen PEPs? 7 a What is the media due to by the Entity to screen PEPs? 7 a What is the media due to by the Entity to screen PEPs? 7 a What is the media due by the Entity to screen PEPs? 7 a What is the media due by the Entity to screen PEPs? 7 a What is the media due by the Entity to screen PEPs? 7 a What is the media due by the Entity to screen PEPs? 7 a What is the media due by the Entity to screen PEPs? 7 a What is the media due by the Entity to screen PEPs? 7 a What is the media due by the Entity to screen PEPs? 7 a What is the media due of the Entity to screen PEPs? 7 a What is the media due of the Entity to screen PEPs? 7 a What is the System of the System of the What is the System of the System	70		
The control of the co	. •		Combination of automated and manual
Outborners and connected perities to obtainmine whaters' they we PEPs an conclude by PEPs 2" 71 at 1 NF1.1s this at: 71 at 2 KKY cranewal 7 Ves 73 at 3 Trigger event 7 Ves 74 at 3 Trigger event 7 Ves 75 Ones the Entity have policies, procedure and recordinate of authority of the Entity that policies of procedure and recordinate of the Entity have policies, procedure and event of the Entity have policies or received and event of the Entity have policies or received and event of the Entity have policies or received and event of the Entity have policies from screening they are PEPs, and conclude by PEPs, and they person when they are person when they a		Adverse Media/Negative News?	
customers and connected parties to solemnine whether they we PEPs. or controlled by PEPs? 71 at 1	71	Does the Entity have a risk based approach to screening	
they are PEPs, or controlled by PEPs? 7a		customers and connected parties to determine whether	Vos
71 at 1 Observating		they are PEPs or controlled by PEPs?	165
71 a2		they are 1 Et 3, or controlled by 1 Et 3:	
7 a 2 KYC renewal Yes 7 a 3 Togge event Yes 7 2 What is the method used by the Entity to acceen PEPa? Conference of the Entity three policy is procedure and processes to review and escalable potential machines from surpening casternes and commodel parties to determine whether they are PEPa, controlled by PEPa? Conference of the Entity three policy is processed to review and escalable potential machines from surpening casternes and commodel frequencies based on risk rating (Pendud Reviews)? 7 a 1 Lex Symmon on the Perand of the	71 a	If Y, is this at:	
7 a 2 KYC renewal Yes 7 a 3 Togge event Yes 7 2 What is the method used by the Entity to acceen PEPa? Conference of the Entity three policy is procedure and processes to review and escalable potential machines from surpening casternes and commodel parties to determine whether they are PEPa, controlled by PEPa? Conference of the Entity three policy is processed to review and escalable potential machines from surpening casternes and commodel frequencies based on risk rating (Pendud Reviews)? 7 a 1 Lex Symmon on the Perand of the	71 a1	Onhoarding	Voc
71 a.2		<u> </u>	
What is the method used by the Entity to screen PEPS			Yes
Does the Entity have policies, procedures and processes to review and escalate proteinal machase from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 4 BKYC renewed at defined frequencies based on risk miting (Periodic Reviews)? 74 a 1 I yes, select all that apply: 74 a 1 I yes, select all that apply: 74 a 2 1 - 2 years 75 a 3 3 - 4 years 76 a 3 3 - 4 years 77 a 4 5 years on more 78 a 5 Trigger-based or peripelual monitoring reviews 78 a 6 Cher (Please specify) 78 a 1 Trigger-based or peripelual monitoring reviews 79 a 1	71 a3	Trigger event	Yes
Does the Entity have policies, procedures and processes to review and escalate proteinal machase from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 4 BKYC renewed at defined frequencies based on risk miting (Periodic Reviews)? 74 a 1 I yes, select all that apply: 74 a 1 I yes, select all that apply: 74 a 2 1 - 2 years 75 a 3 3 - 4 years 76 a 3 3 - 4 years 77 a 4 5 years on more 78 a 5 Trigger-based or peripelual monitoring reviews 78 a 6 Cher (Please specify) 78 a 1 Trigger-based or peripelual monitoring reviews 79 a 1	72	What is the method used by the Entity to screen PERs?	Combination of automated and manual
to review and escalate potential matches from screening casterness and connected parties to determine whether they are PEPs, or controlled by PEPs? 74 a			Combination of automated and manual
customers and connected parties to determine whether they are PEPs, or control by PEPs? 74 at 1	13		
ties are being contentional to the production of the content of th		to review and escalate potential matches from screening	W
The content of the		customers and connected parties to determine whether	res
Table Tabl		they are PEPs, or controlled by PEPs?	
rating (Periodic Reviews)? 7a a I Iyes, select all that apply: 7a a I Iyes, select all that apply: 7a a I I - 2 years 7a a 3 3 - 4 years 7a a 3 3 - 4 years 7a a 3 3 - 4 years 7a a 6			
restrig (Persons Newtons) / 74 at 1	74	· ·	Vas
74 al		rating (Periodic Reviews)?	163
74 al	74 a	If yes, select all that apply:	
74 a2 1 - 2 years			N-
74.9.4 Syears more 74.9.5 Syears or more 74.9.5 Other (Please specify) 75 Does the Entity maintain and report metrics on current and past periodic or trigger event due diagence reviews? 76 From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity FCC programm? 78 Ams, defence, military 78 B Respondent Banks 78 c Embassic/Correspondent Banks 79 correspondent Banks 79 correspondent Banks 70 c Embassic/Consultates 70 c Ams, defence, military 71 correspondent Banks 72 correspondent Banks 73 correspondent Banks 74 c Embassic/Counsultates 75 c Embassic/Consultates 75 c Embassic/Consultates 76 c Embassic/Consultates 77 c Banks Correspondent Banks 78 c Embassic/Consultates 78 c Banks Correspondent Banks 79 correspo		-	
74 45 Syears or more 74 a 5 Trigger-based or perpetual monitoring reviews 75 Cither (Please specify) 76 Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews? 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, milatory 76 B Respondent Banks 76 D Respondent Banks 76 D Respondent Banks 76 D Respondent Banks 76 C Embassies/Consultator 76 C Embassies/Consultator 76 C Embassies/Consultator 76 C Embassies/Consultator 76 C General Trading Companies FO General Trading Companies FO General Trading Companies FO FO Non-account customers FO H MSMAVTS customers FO H MSMAVTS customers FO H Non-account customers FO H Non-accou	74 a2	1 – 2 years	Yes
74 45 Syears or more 74 a 5 Trigger-based or perpetual monitoring reviews 75 Cither (Please specify) 76 Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews? 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, milatory 76 B Respondent Banks 76 D Respondent Banks 76 D Respondent Banks 76 D Respondent Banks 76 C Embassies/Consultator 76 C Embassies/Consultator 76 C Embassies/Consultator 76 C Embassies/Consultator 76 C General Trading Companies FO General Trading Companies FO General Trading Companies FO FO Non-account customers FO H MSMAVTS customers FO H MSMAVTS customers FO H Non-account customers FO H Non-accou	74 a3	3 – 4 years	Yes
74 a6 Other (Please specify) 75 Does the Entity maintain and report metrics on current and past periodic or trigger event due difigence reviews? 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 PCC programme? 76 a Arms, defence, military 76 b Respondent Bank's 76 b Respondent Bank's 76 b Respondent Bank's 76 b Respondent Bank's 76 c Embassies/Consultates Always subject to EDD and the very subject to EDD and the very subject to EDD on risk-based approach 76 c Embassies/Consultates Always subject to EDD 76 d Extractive industries EDD on risk-based approach Please select 76 e Gambling customers Prohibited 76 f General Trading Companies EDD on risk-based approach 76 f General Trading Companies EDD on risk-based approach 76 f Mas/VTS customers Prohibited 76 h MSBM/VTS customers Prohibited 76 i Non-Government Organisations EDD on risk-based approach Prohibited 76 i Non-Government Organisations EDD on risk-based approach Prohibited 76 i Non-Government Organisations EDD on risk-based approach Prohibited 76 i Non-Government Organisations EDD on risk-based approach Prohibited Prohibi		*	
74 a6 Other (Flease specify) 75 Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews? 76 From the list below, which categories of customers or inclustries are subject to EDD andro are restricted, or prohibited by the Entity's FCC programme? 76 Prom the list below, which categories of customers or inclustries are subject to EDD andro are restricted, or prohibited by the Entity's FCC programme? 76 Promise and the elements as set out in the Worksberg Correspondent Banking Principles 2022? 76 C Embassies/Consultates 76 C Embassies/Consultates 76 Embassies/Consultates 76 Embassies/Consultates 76 Embassies/Consultates 76 General Trading Companies 76 General Trading Companies 77 General Trading Companies 78 Marijuana-related Entities 79 Don the we this category of customer or industry 79 In MSRAMT'S customers 70 In Mon-account customers 70 EDD on risk-based approach 71 Nuclear power 72 Don thisk-based approach 73 In Mon-account customers 74 EDD on risk-based approach 75 In Mon-account customers 75 EDD on risk-based approach 76 In Mon-account customers 76 EDD on risk-based approach 77 In Mon-account customers 78 EDD on risk-based approach 79 In Mon-account customers 79 EDD on risk-based approach 79 In Mon-account customers 79 EDD on risk-based approach 79 In Mon-account customers 79 EDD on risk-based approach 79 In Mon-account customers 79 EDD on risk-based approach 79 PEPS 79 Always subject to EDD 79 PEP Close Associates 79 EDD on risk-based approach 79 PEPS On risk-based approach 79 Per One above risk on risk-based approach 79 Per One above risk on risk-based approach 79 Per One above risk on risk-based		-	
75 Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews? 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 76 B Respondent Banks 76 B Respondent Banks 76 Corespondent Banks 76 Cores		rigger-based or perpetual monitoring reviews	Yes
Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews? The promise of the provided of trigger event due diligence reviews? The promise of the provided of the provided of prohibited by the Entity's PCC programme? The provided of the PCC programme? The provided of the PCC provided	74 a6	Other (Please specify)	
and past periodic or trigger event due diligence reviews? 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 PCC programme? 76 A Arms, defence, military EDD on risk-based approach 76 b Respondent Banks Do not have this category of customer or industry 76 b Respondent Banks Do not have this category of customer or industry 76 b Respondent Banks Do not have this category of customer or industry 76 b Respondent Banking Principles 2022? 76 c Embassies/Consulates Always subject to EDD 76 d Extractive industries EDD on risk-based approach 76 d Gambling customers Prohibited 76 d Gambling customers Prohibited 76 d General Trading Companies EDD on risk-based approach 76 g Marijuana-related Entities Do not have this category of customer or industry 76 h MSB/MVTS customers Prohibited 76 h Non-account customers EDD on risk-based approach 76 h Non-account Customers EDD on risk-based approach 76 k Non-resident customers EDD on risk-based approach 76 m Payment Service Providers Prohibited 76 m Payment Service Providers Prohibited 76 m Payment Service Providers Prohibited 76 p PEP Close Associates EDD on risk-based approach 76 p PEP Related EDD on risk-based approach 76 p Petrous metals and stones EDD on risk-based approach 76 p Den risk-based approach 76 p Den risk-based petroach 76 p Den risk-based petroach 77 prohibited Providers Prohibited 77 Unregulated charities Do not have this category of customer or industry 77 prohib		' ''	
and past periodic or trigger event due diligence reviews? 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 PCC programme? 76 A Arms, defence, military EDD on risk-based approach 76 b Respondent Banks Do not have this category of customer or industry 76 b Respondent Banks Do not have this category of customer or industry 76 b Respondent Banks Do not have this category of customer or industry 76 b Respondent Banking Principles 2022? 76 c Embassies/Consulates Always subject to EDD 76 d Extractive industries EDD on risk-based approach 76 d Gambling customers Prohibited 76 d Gambling customers Prohibited 76 d General Trading Companies EDD on risk-based approach 76 g Marijuana-related Entities Do not have this category of customer or industry 76 h MSB/MVTS customers Prohibited 76 h Non-account customers EDD on risk-based approach 76 h Non-account Customers EDD on risk-based approach 76 k Non-deventment Organisations EDD on risk-based approach 76 k Non-deventment Organisations EDD on risk-based approach 76 m Payment Service Providers Prohibited 76 m Payment Service Providers Prohibited 76 m Payment Service Providers Prohibited 76 p PEP Close Associates EDD on risk-based approach 76 p PEP Related EDD on risk-based approach 76 p Red light businesses/Adult entertainment Do not have this category of customer or industry 76 s Regulated charities Do not have this category of customer or industry 76 w Unregulated charities DD on risk-based approach 76 u Travel and Tour Companies EDD on risk-based approach 76 u Travel and Tour Companies EDD on risk-based approach 76 w Unregulated charities DD on thisk-based approach 76 w Unregulated charities DD on thisk-based approach 77 u If restricted, provide details of the restriction Restric			
and past periodic or trigger event due diligence reviews? 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 PCC programme? 76 A Arms, defence, military EDD on risk-based approach 76 b Respondent Banks Do not have this category of customer or industry 76 b Respondent Banks Do not have this category of customer or industry 76 b Respondent Banks Do not have this category of customer or industry 76 b Respondent Banking Principles 2022? 76 c Embassies/Consulates Always subject to EDD 76 d Extractive industries EDD on risk-based approach 76 d Gambling customers Prohibited 76 d Gambling customers Prohibited 76 d General Trading Companies EDD on risk-based approach 76 g Marijuana-related Entities Do not have this category of customer or industry 76 h MSB/MVTS customers Prohibited 76 h Non-account customers EDD on risk-based approach 76 h Non-account Customers EDD on risk-based approach 76 k Non-deventment Organisations EDD on risk-based approach 76 k Non-deventment Organisations EDD on risk-based approach 76 m Payment Service Providers Prohibited 76 m Payment Service Providers Prohibited 76 m Payment Service Providers Prohibited 76 p PEP Close Associates EDD on risk-based approach 76 p PEP Related EDD on risk-based approach 76 p Red light businesses/Adult entertainment Do not have this category of customer or industry 76 s Regulated charities Do not have this category of customer or industry 76 w Unregulated charities DD on risk-based approach 76 u Travel and Tour Companies EDD on risk-based approach 76 u Travel and Tour Companies EDD on risk-based approach 76 w Unregulated charities DD on thisk-based approach 76 w Unregulated charities DD on thisk-based approach 77 u If restricted, provide details of the restriction Restric			
and past periodic or trigger event due diligence reviews? From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's PCC programme? Fa Arms, defence, military BDD on risk-based approach The BDD or risk-ba			
and past periodic or trigger event due diligence reviews? From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's PCC programme? Fa Arms, defence, military BDD on risk-based approach The BDD or risk-ba	75	Doos the Entity maintain and report matrice on assessed	
reviewes? From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme? 76 a Arms, defence, military EDD on risk-based approach 76 b Respondent Banks Do not have this category of customer or industry 76 b Respondent Banks Do not have this category of customer or industry 76 c Embassies/Consulates Always subject to EDD 76 c Embassies/Consulates Always subject to EDD 76 d Estractive industries EDD on risk-based approach 76 e Gambling customers Prohibited 76 f General Trading Companies EDD on risk-based approach 76 f General Trading Companies EDD on risk-based approach 76 h MSBM/TS customers Prohibited 76 h MSBM/TS customers EDD on risk-based approach 76 i Non-account customers EDD on risk-based approach 76 i Non-account customers EDD on risk-based approach 76 k Non-account customers EDD on risk-based approach 76 k Non-estident customers EDD on risk-based approach 76 k Non-resident customers EDD on risk-based approach 76 k Non-resident customers EDD on risk-based approach 76 m Payment Service Providers EDD on risk-based approach 76 m Payment Service Providers EDD on risk-based approach 76 n PEP Always subject to EDD 76 n PeP Related EDD on risk-based approach 76 p PEP Related EDD on risk-based approach 76 q Preclous metals and stones EDD on risk-based approach 76 s Regulated charities EDD on risk-based approach 76 s Regulated charities EDD on risk-based approach 76 s Regulated charities EDD on risk-based approach 76 s Negulated charities EDD on risk-based approach 76 s Negulated charities EDD on risk-based approach 76 v Unregulated charities EDD on risk-based approach 77 v	7.5		
From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's PCC programme? 76 a Arms, defence, military 8 Do n risk-based approach 76 b Respondent Banks 9 Do n to thave this category of customer or industry 76 b Respondent Banks 1 FEDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? 76 c Embassies/Consulates 76 d Extractive industries 8 Do n risk-based approach 76 e Gambling customers Prohibited 76 f General Trading Companies 8 EDD on risk-based approach 76 g Marijuana-related Entities 9 Do not have this category of customer or industry 76 h MSB/MVTS customers Prohibited 76 i Non-account customers 10 Do not have this category of customer or industry 76 k Non-resident customers 10 Do not have this category of customer or industry 76 m Payment Service Providers 76 n Peps On Payment Service Providers 76 n Peps 77 Always subject to EDD 78 o PEP Close Associates 10 Do not have this category of customer or industry 76 n Peps On Pep Close Associates 10 Do not have this category of customer or industry 76 n Peps On Pep Close Associates 10 Do not have this category of customer or industry 76 n Pep Close Associates 10 Do not have this category of customer or industry 76 n Pep Related 10 Do not have this category of customer or industry 76 n Pep Red light businesses/Adult entertainment 10 Do not have this category of customer or industry 76 n Regulated charities 10 Do not have this category of customer or industry 76 n Pep Red light businesses/Adult entertainment 10 Do not have this category of customer or industry 76 n Pep Do not have this category of customer or industry 76 n Pep Close Associates 10 Do not have this category of customer or industry 10 Do not have this category of customer or industry 10 Do not have this category of customer or industry 10 Do not have this category of customer or industry 11 Do not have			Yes
industries are subject to EDD and/or are restricted, or prohibited by the Entity's PCC programme? 76 a Arms, defence, military Do not have this category of customer or industry 76 b Respondent Banks Do not have this category of customer or industry 76 b Respondent Banks Pfinciples 2022? 76 c Embassies/Consulates Always subject to EDD 76 d Extractive industries EDD on risk-based approach 76 e General Trading Companies EDD on risk-based approach 76 f General Trading Companies EDD on risk-based approach 76 g Marijuana-related Entities Do not have this category of customer or industry 76 h MSBANYTS customers Prohibited 76 i Non-ecount customers Prohibited 76 i Non-ecount customers Prohibited 76 i Non-ecount customers EDD on risk-based approach 76 in Peps Do no Have this category of customer or industry 76 m Payment Service Providers EDD on risk-based approach 76 n PEPS Always subject to EDD 76 n PEPS Always subject to EDD 76 n PEP Close Associates EDD on risk-based approach 76 p PEP Related EDD on risk-based approach 76 p PEP Related EDD on risk-based approach 76 p PEP Related EDD on risk-based approach 76 p PEP Close Associates EDD on risk-based approach 76 p PEP Close Associates EDD on risk-based approach 76 p PEP Close Associates EDD on risk-based approach 76 p PEP Close Associates EDD on risk-based approach 76 p PEP Close Associates EDD on risk-based approach 76 p PEP Close Associates EDD on risk-based approach 76 p PEP Close Associates EDD on risk-based approach 76 p PEP Close Associates EDD on risk-based approach 76 p PEP Close Associates EDD on risk-based approach 76 p PEP Close Associates EDD on risk-based approach 76 p PEP Close Associates EDD on risk-based approach 77 p Per Close Associates EDD on risk-based		reviews?	
industries are subject to EDD and/or are restricted, or prohibited by the Entity's PCC programme? 76 a Arms, defence, military Do not have this category of customer or industry 76 b Respondent Banks Do not have this category of customer or industry 76 b Respondent Banks Pfinciples 2022? 76 c Embassies/Consulates Always subject to EDD 76 d Extractive industries EDD on risk-based approach 76 e General Trading Companies EDD on risk-based approach 76 f General Trading Companies EDD on risk-based approach 76 g Marijuana-related Entities Do not have this category of customer or industry 76 h MSBANYTS customers Prohibited 76 i Non-ecount customers Prohibited 76 i Non-ecount customers Prohibited 76 i Non-ecount customers EDD on risk-based approach 76 in Peps Do no Have this category of customer or industry 76 m Payment Service Providers EDD on risk-based approach 76 n PEPS Always subject to EDD 76 n PEPS Always subject to EDD 76 n PEP Close Associates EDD on risk-based approach 76 p PEP Related EDD on risk-based approach 76 p PEP Related EDD on risk-based approach 76 p PEP Related EDD on risk-based approach 76 p PEP Close Associates EDD on risk-based approach 76 p PEP Close Associates EDD on risk-based approach 76 p PEP Close Associates EDD on risk-based approach 76 p PEP Close Associates EDD on risk-based approach 76 p PEP Close Associates EDD on risk-based approach 76 p PEP Close Associates EDD on risk-based approach 76 p PEP Close Associates EDD on risk-based approach 76 p PEP Close Associates EDD on risk-based approach 76 p PEP Close Associates EDD on risk-based approach 76 p PEP Close Associates EDD on risk-based approach 76 p PEP Close Associates EDD on risk-based approach 77 p Per Close Associates EDD on risk-based	76		
prohibited by the Entity's PCC programme?	70		
76 a		industries are subject to EDD and/or are restricted, or	
76 a		prohibited by the Entity's FCC programme?	
Teb			
If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Please select	76 a	Arms, detence, military	EDD on risk-based approach
If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	76 b	Respondent Banks	Do not have this category of customer or industry
contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? 76 c Embassies/Consulates Always subject to EDD 76 d Extractive industries EDD on risk-based approach 76 e Gambling customers Prohibited 76 g Gambling customers EDD on risk-based approach 76 g Marijuana-related Entities Do not have this category of customer or industry 76 h MSBM/TS customers Prohibited 76 i Non-account customers EDD on risk-based approach 76 j Non-covernment Organisations EDD on risk-based approach 76 k Non-resident customers EDD on risk-based approach 76 l Nuclear power Do not have this category of customer or industry 76 m Payment Service Providers Prohibited 76 n PEPS 76 n PEPS 76 n PEP Related EDD on risk-based approach 76 q Precious metals and stones EDD on risk-based approach 76 q Precious metals and stones EDD on risk-based approach 76 r Rel light businesses/Adult entertainment Do not have this category of customer or industry 76 s Regulated charities EDD on risk-based approach 76 r Rel light businesses/Adult entertainment Do not have this category of customer or industry 76 s Regulated charities EDD on risk-based approach 76 t Shell banks Prohibited 76 v Unregulated charities EDD on risk-based approach 76 v Unregulated charities EDD on risk-based approach 76 v Unregulated Charities EDD on risk-based approach 76 v Unregulated Charities Do not have this category of customer or industry 76 w Used Car Dealers EDD on risk-based approach 76 v Unregulated Charities Do not have this category of customer or industry 76 w Used Car Dealers EDD on risk-based approach 76 v Unregulated charities Do not have this category of customer or industry 77 If restricted, provide details of the restriction 78 Restriction is dependent on details of activities.	76 h1	•	,
Correspondent Banking Principles 2022? 76 c Embassies/Consulates Always subject to EDD 76 d Extractive industries EDD on risk-based approach 76 e Gambling customers Prohibited 76 f General Trading Companies EDD on risk-based approach 76 g Marijuana-related Entities Do not have this category of customer or industry 76 h MSBM/VTS customers Prohibited 76 i Non-account customers EDD on risk-based approach 76 j Non-Government Organisations EDD on risk-based approach 76 k Non-resident customers EDD on risk-based approach 76 l Nuclear power Do not have this category of customer or industry 76 m Payment Service Providers Prohibited 76 n PEPS Always subject to EDD 76 o PEP Close Associates EDD on risk-based approach 76 p PEP Related EDD on risk-based approach 76 q Precious metals and stones EDD on risk-based approach 76 q Precious metals and stones EDD on risk-based approach 76 r Red light businesses/Adult entertainment Do not have this category of customer or industry 76 s Regulated charities EDD on risk-based approach 76 t Shell banks Prohibited 76 u Travel and Tour Companies EDD on risk-based approach 76 v Unregulated charities Do not have this category of customer or industry 76 w Used Car Dealers EDD on risk-based approach 76 v Virtual Asset Service Providers Prohibited 77 lif restricted, provide details of the restriction Restriction is dependent on details of activities.	7001	· ·	
Teleparation			Please select
Telegraph		Correspondent Banking Principles 2022?	
Telegraph	76.0	Embassics/Canaulates	Always subject to EDD
Total Gambling customers			
Telegraph	76 d	Extractive industries	EDD on risk-based approach
Telegraph	76 e	Gambling customers	Prohibited
Telegraph		-	
76 h MSB/MVTS customers Prohibited 76 i Non-account customers EDD on risk-based approach 76 j Non-Government Organisations EDD on risk-based approach 76 k Non-resident customers EDD on risk-based approach 76 k Nuclear power Do not have this category of customer or industry 76 m Payment Service Providers Prohibited 76 n PEPs Always subject to EDD 76 o PEP Close Associates EDD on risk-based approach 76 p PEP Related EDD on risk-based approach 76 p PEP Related EDD on risk-based approach 76 r Red light businesses/Adult entertainment Do not have this category of customer or industry 76 s Regulated charities EDD on risk-based approach 76 t Shell banks Prohibited 76 u Travel and Tour Companies EDD on risk-based approach 76 v Unregulated charities Do not have this category of customer or industry 76 w Used Car Dealers EDD on risk-based approach 76 x Virtual Asset Service Providers Prohibited 77 ulf restricted, provide details of the restriction Restriction is dependent on details of activities.	76 f	General Trading Companies	EDD on risk-based approach
76 h MSB/MVTS customers Prohibited 76 i Non-account customers EDD on risk-based approach 76 j Non-Government Organisations EDD on risk-based approach 76 k Non-resident customers EDD on risk-based approach 76 k Nuclear power Do not have this category of customer or industry 76 m Payment Service Providers Prohibited 76 n PEPs Always subject to EDD 76 o PEP Close Associates EDD on risk-based approach 76 p PEP Related EDD on risk-based approach 76 p PEP Related EDD on risk-based approach 76 r Red light businesses/Adult entertainment Do not have this category of customer or industry 76 s Regulated charities EDD on risk-based approach 76 t Shell banks Prohibited 76 u Travel and Tour Companies EDD on risk-based approach 76 v Unregulated charities Do not have this category of customer or industry 76 w Used Car Dealers EDD on risk-based approach 76 x Virtual Asset Service Providers Prohibited 77 ulf restricted, provide details of the restriction Restriction is dependent on details of activities.	76 a	Marijuana-related Entities	Do not have this category of customer or industry
76 i Non-account customers		•	
Red light businesses/Adult entertainment Do not have this category of customer or industry	76 h	MSB/MVTS customers	Prohibited
Red light businesses/Adult entertainment Do not have this category of customer or industry	76 i	Non-account customers	EDD on risk-based approach
76 k Non-resident customers EDD on risk-based approach 76 I Nuclear power Do not have this category of customer or industry 76 m Payment Service Providers Prohibited 76 n PEPs Always subject to EDD 76 o PEP Close Associates EDD on risk-based approach 76 p PEP Related EDD on risk-based approach 76 q Precious metals and stones EDD on risk-based approach 76 r Red light businesses/Adult entertainment Do not have this category of customer or industry 76 s Regulated charities EDD on risk-based approach 76 t Shell banks Prohibited 76 u Travel and Tour Companies EDD on risk-based approach 76 v Unregulated charities Do not have this category of customer or industry 76 w Used Car Dealers EDD on risk-based approach 76 x Virtual Asset Service Providers Prohibited 76 y Other (specify) If restricted, provide details of the restriction Restriction is dependent on details of activities.			
To Nuclear power Do not have this category of customer or industry	/ b J	I NOR-L-OVERNMENT ()reaniestione	EDD
To Nuclear power Do not have this category of customer or industry	76 k	Non-Government Organisations	EDD on risk-based approach
76 m Payment Service Providers Prohibited 76 n PEPs Always subject to EDD 76 o PEP Close Associates EDD on risk-based approach 76 p PEP Related EDD on risk-based approach 76 q Precious metals and stones EDD on risk-based approach 76 r Red light businesses/Adult entertainment Do not have this category of customer or industry 76 s Regulated charities EDD on risk-based approach 76 t Shell banks Prohibited 76 u Travel and Tour Companies EDD on risk-based approach 76 v Unregulated charities Do not have this category of customer or industry 76 w Used Car Dealers EDD on risk-based approach 76 x Virtual Asset Service Providers Prohibited 76 y Other (specify) Restriction is dependent on details of activities.		-	
76 n PEPs Always subject to EDD 76 o PEP Close Associates EDD on risk-based approach 76 p PEP Related EDD on risk-based approach 76 q Precious metals and stones EDD on risk-based approach 76 r Red light businesses/Adult entertainment Do not have this category of customer or industry 76 s Regulated charities EDD on risk-based approach 76 t Shell banks Prohibited 76 u Travel and Tour Companies EDD on risk-based approach 76 v Unregulated charities Do not have this category of customer or industry 76 w Used Car Dealers EDD on risk-based approach 76 v Other (specify) 77 If restricted, provide details of the restriction Restriction is dependent on details of activities.	76	Non-resident customers	EDD on risk-based approach
76 n PEPs Always subject to EDD 76 o PEP Close Associates EDD on risk-based approach 76 p PEP Related EDD on risk-based approach 76 q Precious metals and stones EDD on risk-based approach 76 r Red light businesses/Adult entertainment Do not have this category of customer or industry 76 s Regulated charities EDD on risk-based approach 76 t Shell banks Prohibited 76 u Travel and Tour Companies EDD on risk-based approach 76 v Unregulated charities Do not have this category of customer or industry 76 w Used Car Dealers EDD on risk-based approach 76 v Other (specify) 77 If restricted, provide details of the restriction Restriction is dependent on details of activities.		Non-resident customers Nuclear power	EDD on risk-based approach
Teleptocal Pep Close Associates		Non-resident customers Nuclear power	EDD on risk-based approach Do not have this category of customer or industry
76 p PEP Related EDD on risk-based approach 76 q Precious metals and stones EDD on risk-based approach 76 r Red light businesses/Adult entertainment Do not have this category of customer or industry 76 s Regulated charities EDD on risk-based approach 76 t Shell banks Prohibited 76 u Travel and Tour Companies EDD on risk-based approach 76 v Unregulated charities Do not have this category of customer or industry 76 w Used Car Dealers EDD on risk-based approach 76 x Virtual Asset Service Providers Prohibited 76 y Other (specify) Restriction is dependent on details of activities.	76 m	Non-resident customers Nuclear power Payment Service Providers	EDD on risk-based approach Do not have this category of customer or industry Prohibited
76 p PEP Related EDD on risk-based approach 76 q Precious metals and stones EDD on risk-based approach 76 r Red light businesses/Adult entertainment Do not have this category of customer or industry 76 s Regulated charities EDD on risk-based approach 76 t Shell banks Prohibited 76 u Travel and Tour Companies EDD on risk-based approach 76 v Unregulated charities Do not have this category of customer or industry 76 w Used Car Dealers EDD on risk-based approach 76 x Virtual Asset Service Providers Prohibited 76 y Other (specify) Restriction is dependent on details of activities.	76 m 76 n	Non-resident customers Nuclear power Payment Service Providers PEPs	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD
76 q Precious metals and stones EDD on risk-based approach 76 r Red light businesses/Adult entertainment Do not have this category of customer or industry 76 s Regulated charities EDD on risk-based approach 76 t Shell banks Prohibited 76 u Travel and Tour Companies EDD on risk-based approach 76 v Unregulated charities Do not have this category of customer or industry 76 w Used Car Dealers EDD on risk-based approach 76 x Virtual Asset Service Providers Prohibited 76 y Other (specify) Restriction is dependent on details of activities.	76 m 76 n	Non-resident customers Nuclear power Payment Service Providers PEPs	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD
76 r Red light businesses/Adult entertainment Do not have this category of customer or industry 76 s Regulated charities EDD on risk-based approach 76 t Shell banks Prohibited 76 u Travel and Tour Companies EDD on risk-based approach 76 v Unregulated charities Do not have this category of customer or industry 76 w Used Car Dealers EDD on risk-based approach 76 x Virtual Asset Service Providers Prohibited 76 y Other (specify) 77 If restricted, provide details of the restriction Restriction is dependent on details of activities.	76 m 76 n 76 o	Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD EDD on risk-based approach
76 s Regulated charities EDD on risk-based approach 76 t Shell banks Prohibited 76 u Travel and Tour Companies EDD on risk-based approach 76 v Unregulated charities Do not have this category of customer or industry 76 w Used Car Dealers EDD on risk-based approach 76 x Virtual Asset Service Providers Prohibited 76 y Other (specify) 77 If restricted, provide details of the restriction Restriction is dependent on details of activities.	76 m 76 n 76 o 76 p	Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD EDD on risk-based approach EDD on risk-based approach
76 s Regulated charities EDD on risk-based approach 76 t Shell banks Prohibited 76 u Travel and Tour Companies EDD on risk-based approach 76 v Unregulated charities Do not have this category of customer or industry 76 w Used Car Dealers EDD on risk-based approach 76 x Virtual Asset Service Providers Prohibited 76 y Other (specify) 77 If restricted, provide details of the restriction Restriction is dependent on details of activities.	76 m 76 n 76 o 76 p	Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD EDD on risk-based approach EDD on risk-based approach
76 t Shell banks Prohibited 76 u Travel and Tour Companies EDD on risk-based approach 76 v Unregulated charities Do not have this category of customer or industry 76 w Used Car Dealers EDD on risk-based approach 76 x Virtual Asset Service Providers Prohibited 76 y Other (specify) 77 If restricted, provide details of the restriction Restriction is dependent on details of activities.	76 m 76 n 76 o 76 p 76 q	Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach
76 u Travel and Tour Companies EDD on risk-based approach 76 v Unregulated charities Do not have this category of customer or industry 76 w Used Car Dealers EDD on risk-based approach 76 x Virtual Asset Service Providers Prohibited 76 y Other (specify) 77 If restricted, provide details of the restriction Restriction is dependent on details of activities.	76 m 76 n 76 o 76 p 76 q 76 r	Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry
76 u Travel and Tour Companies EDD on risk-based approach 76 v Unregulated charities Do not have this category of customer or industry 76 w Used Car Dealers EDD on risk-based approach 76 x Virtual Asset Service Providers Prohibited 76 y Other (specify) 77 If restricted, provide details of the restriction Restriction is dependent on details of activities.	76 m 76 n 76 o 76 p 76 q 76 r	Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach 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 EDD on risk-based approach 76 x Virtual Asset Service Providers Prohibited 76 y Other (specify) 77 If restricted, provide details of the restriction Restriction is dependent on details of activities.	76 m 76 n 76 o 76 p 76 q 76 r	Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach
76 w Used Car Dealers EDD on risk-based approach 76 x Virtual Asset Service Providers Prohibited 76 y Other (specify) 77 If restricted, provide details of the restriction Restriction is dependent on details of activities.	76 m 76 n 76 o 76 p 76 q 76 r 76 s	Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited
76 w Used Car Dealers EDD on risk-based approach 76 x Virtual Asset Service Providers Prohibited 76 y Other (specify) 77 If restricted, provide details of the restriction Restriction is dependent on details of activities.	76 m 76 n 76 o 76 p 76 q 76 r 76 s	Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited
76 x Virtual Asset Service Providers Prohibited 76 y Other (specify) 77 If restricted, provide details of the restriction Restriction is dependent on details of activities.	76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t	Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach
76 y Other (specify) 77 If restricted, provide details of the restriction Restriction is dependent on details of activities.	76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u	Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach Do not have this category of customer or industry
76 y Other (specify) 77 If restricted, provide details of the restriction Restriction is dependent on details of activities.	76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w	Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach Do not have this category of customer or industry
77 If restricted, provide details of the restriction Restriction is dependent on details of activities.	76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w	Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach
Restriction is dependent on details of activities.	76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w	Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach
Restriction is dependent on details of activities.	76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w	Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach
Restriction is dependent on details of activities.	76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w	Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach
Restriction is dependent on details of activities.	76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w	Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach
Restriction is dependent on details of activities.	76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w	Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach
	76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 x	Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach
79 Does EDD require senior business management and	76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 x	Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited
79 Does EDD require senior business management and/	76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 x	Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited
79 Does EDD require senior business management and/	76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 x	Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited
70 Does EDD require senior business management and	76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 x	Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited
	76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 x	Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited
	76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 x 76 y	Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify) If restricted, provide details of the restriction	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited
or compliance approval?	76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 x	Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify) If restricted, provide details of the restriction Does EDD require senior business management and/	EDD on risk-based approach Do not have this category of customer or industry Prohibited Always subject to EDD EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited EDD on risk-based approach Do not have this category of customer or industry EDD on risk-based approach Prohibited Restriction is dependent on details of activities.

78 a	f Y indicate who provides the approval:	Both
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Yes
80	Does the Entity perform an additional control or quality review on dients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
82	If appropriate, provide any additional information/context to the answers in this section.	Subject to local / legal restrictions.
8. MONITO	ORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	The following types of transactions are monitored manually: Documentary Trade Finance transactions.
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Both
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	SIRON
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	Other - Please explain (in Question 91)
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	Q84 b2: < 1 year on the basis that the last completed coverage Transaction Monitoring assessment was in 2022 and the quarterly Management Information has not been completed in full for 2023. Q84 b3: Automated Transaction Monitoring application was last calibrated in 2018 and tuning is in flight at present.
9. PAYMEN	IT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes

93	Does the Entity have policies, procedures and processes to comply with and have controls in place	
	to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	EU Regulation 2015/847 on information accompanying transfers of funds ("Wire Transfer Regulation 2")
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC	TIONS	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Both Automated and Manual
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Both
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Hotscan, Safewatch, Finscan, SEPA Embargo
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	Other
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Combination of automated and manual
	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 с	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	Japan, lists used by authorities of one of the countries where MUFG Bank (Europe) NV has an office.
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	Q102 a1a: Hotscan - Global Tuning Program 2022/2023; 31-03-2023 Hotscan - Peer Benchmarking Q1 2023; 31-03-2023 Safewatch - Global Tuning Program 2022/2023; 31-03-2023 Finscan - Global Tuning Program 2021/2022: 30-06-2022
11. TRAIN	ING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 с	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to:	V
112 a 112 b	Board and Senior Committee Management 1st Line of Defence	Yes Yes
112 b	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
112 f	Non-employed workers (contractors/consultants)	No
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
		•

115 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
116	If appropriate, provide any additional information/context to the answers in this section.	Q112 e - Some FCC related activities have been outsourced within the MUFG Group, this is not
	information/context to the answers in this section.	viewed as third party outsourcing.
12. QUAL	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based	
	Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based	
	Compliance Testing process (separate from the	Yes
	independent Audit function)?	
119	Confirm that all responses provided in the above	Yes
140 -	Section are representative of all the LE's branches	
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	and the station red that the applies to	
120	If appropriate, provide any additional	
	information/context to the answers in this section.	
42 AUDE		
13. AUDIT 121	In addition to inspections by the government	
	supervisors/regulators, does the Entity have an	
	internal audit function, a testing function or other	
	independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and	Yes
	practices on a regular basis?	
122	How often is the Entity audited on its AML, CTF, ABC,	
122	Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Component-based reviews
123	Does the internal audit function or other independent	
400 -	third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e	Name Screening & List Management	Yes
123 f 123 g	Reporting/Metrics & Management Information Suspicious Activity Filing	Yes Yes
123 g	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123 I	Other (specify)	
124	Are adverse findings from internal & external audit	
	tracked to completion and assessed for adequacy	Yes
105	and completeness?	
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
126	If appropriate, provide any additional	
	information/context to the answers in this section.	
14. FRAU	ID.	
14. FRAU	Does the Entity have policies in place addressing	
	fraud risk?	Yes
128	Does the Entity have a dedicated team responsible	Yes
1	for preventing & detecting fraud?	'**

129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
132	If appropriate, provide any additional information/context to the answers in this section.	MBE has outsourced parts of its fraud prevention/detection activities (intra-group) to MUFG Bank Ltd (UK); For question 128: As MUFG Bank Ltd (UK) performs certain fraud prevention/detection activities on behalf of MBE, the 'dedicated team' consists of local MBE members as well as the MUFG (UK) fraud teams who perform the outsourced activities
<u>Declarati</u>	on Statement	
Declaration S	roup Correspondent Banking Due Dilligence Questionnaire 2023 (Cl Statement (To be signed by Global Head of Correspondent Banl Laundering, Chief Compliance Officer, Global Head of Financial	king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of
		tion name) is fully committed to the fight against financial crime and makes s, regulations and standards in all of the jurisdictions in which it does business and holds accounts.
	al Institution understands the critical importance of having effecti gulatory obligations.	ve and sustainable controls to combat financial crime in order to protect its reputation and to meet its
The Financia standards.	al Institution recognises the importance of transparency regarding	ng parties to transactions in international payments and has adopted/is committed to adopting these
	al Institution further certifies it complies with / is working to comp tion provided in this Wolfsberg CBDDQ will be kept current and v	ly with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. will be updated no less frequently than every eighteen months.
The Financia	al Institution commits to file accurate supplemental information or	n a timely basis.
',		of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that only honest belief, and that I am authorised to execute this declaration on behalf of the Financial
Wo <mark>lfsbeDoc</mark>	ക്കിറ്റ് രൂപ്പോട്ടെ and correct to my honest belief, and that l	ivalent), certify that I have read and understood this declaration, that the answers provided in this am authorised to execute this declaration on behalf of the Financial Institution.
Ele 79B/	na Shakhurina (Signature & Dai	te)
	A1968662748DDocuSigned by: Adam Szczepaniak (Signature & Date of Signature & Date of	te)
	/D0F6F6DBF17474	

DocuSign

Certificate Of Completion

Envelope Id: B07EBFC07AC04D11BCB0678583B537B9

Subject: Complete with DocuSign: CBDDQ v1.4_0 (003) MBE final for sign 14 July 23.pdf

Source Envelope:

Signatures: 2 Document Pages: 13 Certificate Pages: 5 Initials: 0

AutoNav: Enabled

Envelopeld Stamping: Enabled

Time Zone: (UTC-08:00) Pacific Time (US & Canada)

Status: Completed

Envelope Originator:

Umang Jani

umang.jani@nl.mufg.jp IP Address: 18.133.134.16

Record Tracking

Status: Original Holder: Umang Jani Location: DocuSign

7/17/2023 2:38:18 AM umang.jani@nl.mufg.jp

Signer Events

Chief Compliance Officer

DocuSigned by: Adam Szczepaniak Adam Szczepaniak adam.szczepaniak@nl.mufg.jp 7D0F6F6DBF17474...

Security Level: Email, Account Authentication

(None)

Signature **Timestamp**

Sent: 7/17/2023 2:42:54 AM Viewed: 7/17/2023 2:49:24 AM Signed: 7/17/2023 2:49:56 AM

Electronic Record and Signature Disclosure:

Accepted: 7/17/2023 2:49:24 AM ID: d405525c-276f-4f01-9c3f-386d023ea628

Elena Shakhurina elena.shakhurina@nl.mufg.jp COO, Managing Director MUFG Bank Europe NV

Security Level: Email, Account Authentication

(None)

Elena Shakhurina

Signature Adoption: Pre-selected Style Using IP Address: 193.104.4.129

Signature Adoption: Pre-selected Style

Using IP Address: 193.104.4.129

Sent: 7/17/2023 2:42:55 AM Viewed: 7/17/2023 6:37:20 AM Signed: 7/17/2023 6:37:29 AM

Electronic Record and Signature Disclosure:

Accepted: 12/2/2022 8:31:37 AM

In Person Signer Events

Editor Delivery Events

Agent Delivery Events

ID: 9e9c1320-eea5-4fd0-b2c3-12847530ac4b

Signature	Timestamp
Status	Timestamp
Status	Timestamp

Intermediary Delivery Events Status Timestamp

Certified Delivery Events Status Timestamp

Carbon Copy Events Status Timestamp

COPIED

Umang Jani

umang.jani@nl.mufg.jp

Security Level: Email, Account Authentication

(None)

Electronic Record and Signature Disclosure:

Not Offered via DocuSign

Sent: 7/17/2023 2:42:55 AM Resent: 7/17/2023 6:37:32 AM

Witness Events **Signature Timestamp**

Notary Events	Signature	Timestamp			
Envelope Summary Events	Status	Timestamps			
Envelope Sent	Hashed/Encrypted	7/17/2023 2:42:55 AM			
Certified Delivered	Security Checked	7/17/2023 6:37:20 AM			
Signing Complete	Security Checked	7/17/2023 6:37:29 AM			
Completed	Security Checked	7/17/2023 6:37:29 AM			
Payment Events	Status	Timestamps			
Electronic Record and Signature Disclosure					