## the Wolfsberg Group

Financial Institution Name: Location (Country) :

		****	
CACEIS Bank			
Paris, France	m*		

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, it 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.

	rent than its Enlity Head Office, a separate questionnaire can be completed	
No#	Question  ( & OWNERSHIP	Answer
I. EN <i>IIIX</i> 1	Full Legal Name	
1	Full Legal Name	CACEIS Bank
2	Append a list of foreign branches which are covered by this questionnaire	CACEIS Bank Luxembourg Branch, CACEIS Bank Germany Branch, CACEIS Bank Italy Branch, CACEIS Bank Ireland Branch, CACEIS Bank UK Branch, CACEIS Bank Belgium Branch, CACEIS Bank Netherlands Branch, CACEIS Bank Switzerland Branch, CACEIS Bank Zurich Branch and CACEIS Bank New York Representative Office.
3	Full Legal (Registered) Address	89-91, rue Gabriel Péri 92120 Montrouge
4	Full Primary Business Address (if different from above)	Not applicable
5	Date of Entity incorporation/establishment	06/05/1969
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 ¢	Government or State Owned by 25% or more	No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	100% owned by CACEIS S.A. which is 69,5% owned by Crédit Agricole S.A. and 30,5% owned by Santander Investment (wholly owned by Banco Santander S.A.).
7	% of the Entity's total shares composed of bearer shares	0%
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	Not applicable .
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	по
10	Name of primary financial regulator/supervisory authority	French Prudential Supervisory Authority
11	Provide Legal Entity Identifier (LEI) if available	96950023SCR9X9F3L662
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	Crédit Agricole SA
13	Jurisdiction of licensing authority and regulator of ultimate parent	France
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	No
· - 4 CI	1 . Order Darming	I

	F M 2 . 1 . Pa . 322	No ·
14 b	Private Banking	
14 c	Commercial Banking	No
14 d	Transactional Banking	No .
14 e	Investment Banking	No
14 f	Financial Markets Trading	No
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	No -
		No
14 i		
14 [		No
14 k	Other (please explain)	Clearing
		Depository .
		Registrar
		Centralizing Agent
15	Does the Entity have a significant (10% or more) portfolio	
	of non-resident customers or does it derive more than 10%	
	of its revenue from non-resident customers? (Non-resident	No.
	means customers primarily resident in a different	
	jurisdiction to the location where bank services are	
	provided)	
15 a	If Y, provide the top five countries where the non-resident	
	customers are located.	·
		Not applicable
16	Select the closest value:	2.
16 a	Number of employees	5001-10000
16 b	Total Assets	Between \$100 and \$500 million
17	Confirm that all responses provided in the above Section	
• • • • • • • • • • • • • • • • • • • •	are representative of all the LE's branches.	Yes
17 a	If N, clarify which questions the difference/s relate to and	<b>,</b> ·
	the branch/es that this applies to.	Not applicable
		Not applicable
		·
7.5	ifi he is the additional information postory to	
18	if appropriate, provide any additional information/context to	
	the answers in this section.	
	the dilevers in the decision	
	the answers at this decision.	
	are answere in this decision.	
2 PRODUC	,	
	TS & SERVICES	
2. PRODUC	,	
19	Does the Entity offer the following products and services:	
19 19 a	Does the Entity offer the following products and services:  Correspondent Banking	Yes
19 a 19 a 19 a 1	CTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y	Yes
19 19 a	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services	Yes Yes
19 a 19 a 19 a1 19 a1a	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?	Yes
19 a 19 a 19 a 1	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide	Yes
19 a 19 a1 19 a1a 19 a1b	CTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?	Yes
19 a 19 a 19 a1 19 a1a	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in	Yes No '
19 a 19 a1 19 a1a 19 a1b	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in	Yes
19 a 19 a1 19 a1a 19 a1b	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with	Yes No '
19 a 19 a 19 a1 19 a1a 19 a1b	CTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes No No
19 a 19 a1 19 a1a 19 a1b	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients 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	Yes No '
19 a 19 a 1 19 a 1 a 1 19 a 1 a 1 b 1 9 a 1 c 1 9 a 1 d	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients 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?	Yes No No Yes
19 a 19 a 19 a1 19 a1a 19 a1b	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients 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	Yes No No
19 a 19 a 19 a 19 a 1 a 19 a 1 b 19 a 1 c 19 a 1 d 19 a 1 d 19 a 1 e 19 a 1	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients 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?	Yes No No Yes
19 a 19 a 1 19 a 1 a 1 19 a 1 a 1 b 1 9 a 1 c 1 9 a 1 d	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients 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 allow downstream relationships with foreign banks?	Yes No No Yes No
19 a 19 a 19 a 19 a 1 a 19 a 1 b 19 a 1 c 19 a 1 d 19 a 1 d 19 a 1 e 19 a 1	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients 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?	Yes No No Yes No
19 a 19 a 1 19 a 1 a 1	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients 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?	Yes No No Yes No
19 a 19 a 19 a 19 a 1 a 19 a 1 b 19 a 1 c 19 a 1 d 19 a 1 d 19 a 1 e 19 a 1	CTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients 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	Yes No No No Yes No No
19 a 19 a 1 19 a 1 a 1	CTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients 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	Yes No No Yes No
19 a 19 a 1 19 a 1 a 1	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients 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)?	Yes No No No Yes No No
19 a 19 a 1 19 a 1 a 1	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients 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 forer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with	Yes No No No Yes No No
19 a 19 a 1 19 a 1 a 1 b 1 9 a 1 c 1	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients 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)?	Yes No No No Yes No No
19 a 19 a 1 19 a 1 a 1 b 1 9 a 1 c 1	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients 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 forer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with	Yes No No No Yes No No
19 a 19 a 1 19 a 1 a 1 b 19 a 1 c 19 a	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients 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 forer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with	Yes No No No Yes No No
19 a 19 a 1 19 a 1 a 1 b 1 9 a 1 c 1	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients 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 allow downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services 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)?	Yes No No No Yes No No No No
19 a 19 a 1 19 a 1 19 a 1 10 a	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients 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)?  MSBs  MVTSs	Yes No
19 a 19 a 1 19 a 1 a 1 b 19 a 1 c 19 a	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients 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 allow downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services 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)?	Yes No No No No No No No No No

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 c	Cross-Border Remittances	No
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	
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	Q19a: CACEIS' correspondent banking only includes securities accounts opened in the name of banking institutions on behalf of third parties. It excludes correspondant banking with cash accounts only. Correspondent banking flows are filtered in real time relative to international sanction measures and supervised from an AML/CFT risk standpoint, adapted to the risk of each business relationship.
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No .
191	Sponsoring Private ATMs	No .
19 m	Stored Value Instruments	No
19 n	Trade Finance	No ·
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	
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	Not applicable
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not applicable
21	If appropriate, provide any additional information/context to the answers in this section.	Q19a: CACEIS' correspondent banking only includes securities accounts opened in the name of banking institutions on behalf of third parties. It excludes accounts opened exclusively for own account transactions.
3. AML, C	F & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	Yes
22 a 22 b	Adverse Information Screening	Yes
	Beneficial Ownership	Yes
22 c	· · · · · · · · · · · · · · · · · · ·	
22 d	Cash Reporting	Not Applicable
22 e	CDD	Yes
22 f	EDD Independent Testing	Yes
22 g	Independent Testing	Yes
22 h	Penodic Review	Yes
22	Policies and Procedures	Yes
22 j	PEP Screening	Yes
22 k	Risk Assessment	Yes Yes
221	Sanctions	

29 in Thirty are Education with Engineers or the Engineers of the Comment of the			
27 Tailwing and Equation Yes 28 Tarrester Markhold (1994) 29 Tarrester Markhold (1994) 20 Tarrester Markhold (1994) 20 Tarrester Markhold (1994) 21 Tarrester Markhold (1994) 21 Tarrester Markhold (1994) 22 Tarrester Markhold (1994) 23 Tarrester Markhold (1994) 24 Tarrester Markhold (1994) 25 Deep to Bload consultation of Control (1994) 25 Deep to Bload consultation of Control (1994) 26 Deep to Bload consultation of Control (1994) 26 Tarrester Markhold (1994) 27 Deep to Bload consultation of Control (1994) 28 Tarrester Markhold (1994) 29 Deep to Bload consultation of Control (1994) 29 Tarrester Markhold (1994) 20 Tarrester Markhold (1994) 20 Tarrester Markhold (1994) 20 Tarrester Markhold (1994) 21 Tarrester Markhold (1994) 22 Tarrester Markhold (1994) 23 Tarrester Markhold (1994) 24 Tarrester Markhold (1994) 25 Tarrester Markhold (1994) 26 Tarrester Markhold (1994) 26 Tarrester Markhold (1994) 27 Deep to Markhold (1994) 28 Tarrester Markhold (1994) 29 Tarrester Markhold (1994) 29 Tarrester Markhold (1994) 20 Tarrester Markhold (1994) 20 Tarrester Markhold (1994) 20 Tarrester Markhold (1994) 20 Tarrester Markhold (1994) 21 Tarrester Markhold (1994) 22 Tarrester Markhold (1994) 23 Tarrester Markhold (1994) 24 Tarrester Markhold (1994) 25 Tarrester Markhold (1994) 26 Tarrester Markhold (1994) 26 Tarrester Markhold (1994) 27 Tarrester Markhold (1994) 28 Tarrester Markhold (1994) 29 Tarrest	22 m	Suspicious Activity Reporting	Yes
25   Townsey Millime employees are in the Intify's AML. 26   In the Entity's AML. CF & Services project agreement at beat arranged to the Intify's AML. 27   Townsey Millime employees are in the Intify's AML. 28   In the Entity's AML. CF & Services project agreement and the Intify's AML. 29   Control of the Intify's AML. 29   Control of the Entity's AML. 20   Control of the Intify's AML. 20   Townsey Millime and the AML. CF & Services projection for the Intify's AML. 20   Townsey Millime and the AML. CF & Services projection for the Intify's AML. 20   Townsey Millime and the AML. CF & Services projection for the Intify's AML. 20   Townsey Millime and Intify's AML. 21   Townsey Millime and Intify's AML. 22   Townsey Millime and Intify's AML. 23   Townsey Millime and Intify's AML. 24   Townsey Millime and Intify's AML. 25   Townsey Millime and Intify's AML. 26   Townsey Millime and Intify's AML. 27   Townsey Millime and Intify's AML. 28   Townsey Millime and Intify's AML. 28   Townsey Millime and Intify's AML. 29   Townsey Millime and Intify's AML. 20   Town			
14 How many stations controlled by the product of complex of the plantage of t			
The A Searchiser Combinate Description of the product of the produ			
In the Entity Adv. (CFT & Services peloty approved of National Control of National C			11-100
Management Committee's IN, describe your packer in Sections 20   3	24		
Authorition of the state of the Authorition of the Authorition of the State of the Authorition			Yas
Does the Board notwe, assess, and chartege regular reporting to the status of the AL, CTF, & Santonia programme? Yes components of the ALC TS, Santonia programme? The ALC TS, Santonia programme that the ALC TS, Santonia programme? The ALC TS, Santonia programme that the Santonia programme that the Santonia programme that the Santonia programme that the Santonia programme? The ALC TS, Santonia programme that the			1,300
exposing on the status of the AM, CFT, 8 Samptions  Company of the status of the AM, CFT, 8 Samptions  8			
Does the crisis have life parties to carry out any compounds of the ARC, DTF & Sanctions propagaments of the Compounds of the ARC, DTF & Sanctions propagaments of the Compounds of the ARC, DTF & Sanctions propagaments of the Compounds of the ARC, DTF & Sanctions propagaments of the Compounds of the ARC, DTF & Sanctions propagaments of the Compounds of the ARC, DTF & Sanctions of the Compounds of the ARC, DTF & Sanctions of the Compounds of the ARC, DTF & Sanctions of the Compounds of the ARC, DTF & Sanctions of the Compounds of the Compound of the Compounds of the Compound of the Compounds	25		
Source See Entity use thrift parties to carry out any component of the AM, CTS Searchors programmo?  28 a II Y, provide further details  Not applicable  27 Date the entity have a wildself-more policy?  28 Confirm that all responses provided in the above Settlen are representative of all at IL Extraches are representative of all at IL Extraches are streamed to the seed of the throughout the seed of t			Yes
components of its ANAL, CTTS & Sexicions programme?  8	00		
Process   Proc	26		No ·
27 Once the arriery have a whisteledower policy? 28 Occimi find all responses provided in the above Seldin't yet a selding to the above Seldin't yet as selding to the selding the selding to the selding the selding to the selding the selding to the selding to the selding the selding			
27 Ose the antity have a wholatellower profezy? 28 a Corrism that all separates provided in the above Scotion on representative of all the LEV tendroles are representative of all the LEV tendroles are representative of all the LEV tendroles are the separate that in the approximation provides are the separate that in the horsovice that this expellent to the arreview in this section.  29 if approximation, provide any additional information/content to the arreview in this section.  20 If a proxymistry, provide any additional information/content to the arreview in this section.  22 Information and the arreview in this section.  23 Index against any additional and procedures consistent with applicable and Proxymistry and the content and applicable and procedures consistent with applicable and Proxymistry and the content and any additional and procedures consistent with applicable and Proxymistry and a construction.  31 Index against content and application and procedures consistent with applicable and elegistry and procedures are all the section of the application and application an	26 a	If Y, provide further details	~ '
27 Ose the antity have a wholatellower profezy? 28 a Corrism that all separates provided in the above Scotion on representative of all the LEV tendroles are representative of all the LEV tendroles are representative of all the LEV tendroles are the separate that in the approximation provides are the separate that in the horsovice that this expellent to the arreview in this section.  29 if approximation, provide any additional information/content to the arreview in this section.  20 If a proxymistry, provide any additional information/content to the arreview in this section.  22 Information and the arreview in this section.  23 Index against any additional and procedures consistent with applicable and Proxymistry and the content and applicable and procedures consistent with applicable and Proxymistry and the content and any additional and procedures consistent with applicable and Proxymistry and a construction.  31 Index against content and application and procedures consistent with applicable and elegistry and procedures are all the section of the application and application an	. :		Not applicable
28 a Confirm that all responses provides as the above Section are representately of all by £2 branches and the but £2 branches and the pages to the company auditor.  29 If appropriate, provide any additional information/content to the answers in this section.  29 If appropriate, provide any additional information/content to the answers in this section.  29 If appropriate, provide any additional information/content to the answers in this section.  29 If appropriate, provide any additional information/content to the answers in this section.  29 If appropriate, provide any additional information/content to the answers in this section.  29 If a the Entity documented by the company auditor.  20 If a the Entity documented by Entry pages and any providers of requirement to responsibly provent, elected and report requirements to responsibly provent, elected and report requirements with applicable ABC progrations are requiremental to responsibly provent, elected and report section of requirements with applicable ABC progrations are reported by the Entity pages and designated officer or efficient section and the Entity pages and designated officer or efficient section and the Entity pages and designated officer or efficient section and the Entity pages and designated officer or efficient section and the Entity pages and designated officer or efficient section and the Entity pages and designated officer or efficient section and the Entity pages and designated officer or efficient section and the Entity pages and excellent sections and the ABC progrations or receivery of employing officers and the ABC progrations or receivery of employing officers and the ABC progrations or receivery of employing officers and the ABC progrations or receivery of employing officers and the BBC progrations of the Entity pages and the BBC progrations of the ABC progrations or received as a prohibition language that includes the horizon dependent of the Content of the Co	* .		Тот арриодого
28 a Confirm that all responses provides as the above Section are representately of all by £2 branches and the but £2 branches and the pages to the company auditor.  29 If appropriate, provide any additional information/content to the answers in this section.  29 If appropriate, provide any additional information/content to the answers in this section.  29 If appropriate, provide any additional information/content to the answers in this section.  29 If appropriate, provide any additional information/content to the answers in this section.  29 If appropriate, provide any additional information/content to the answers in this section.  29 If a the Entity documented by the company auditor.  20 If a the Entity documented by Entry pages and any providers of requirement to responsibly provent, elected and report requirements to responsibly provent, elected and report requirements with applicable ABC progrations are requiremental to responsibly provent, elected and report section of requirements with applicable ABC progrations are reported by the Entity pages and designated officer or efficient section and the Entity pages and designated officer or efficient section and the Entity pages and designated officer or efficient section and the Entity pages and designated officer or efficient section and the Entity pages and designated officer or efficient section and the Entity pages and designated officer or efficient section and the Entity pages and designated officer or efficient section and the Entity pages and excellent sections and the ABC progrations or receivery of employing officers and the ABC progrations or receivery of employing officers and the ABC progrations or receivery of employing officers and the ABC progrations or receivery of employing officers and the BBC progrations of the Entity pages and the BBC progrations of the ABC progrations or received as a prohibition language that includes the horizon dependent of the Content of the Co	4		
are representative of all the LES transchase  I company auditional information from the branchies frait this applies to.  If appropriate, provide any additional information/bonfex to the survivers in the excitor.  If appropriate, provide any additional information/bonfex to the survivers in the excitor.  22g: Independent testing is performed by this internal Audit from the shareholders and on a regular basis by the company auditor.  A ANTIBRIBERY & CORPUETION.  30   If as the Entity documented policies and procedured consistent with applicable ABD regulations and requirements to reasonably prevent, detect and report information and consistent with applicable ABD regulations and requirements to reasonably prevent, detect and report information and consistent with applicable officer or officers with sufficient experience-perpise to programme that sets minimum ABC administrative.  15	27	Does the entity have a whistleblower policy?	Yes
An In proceedings of the Let Schriches   Not applicable	28	Confirm that all responses provided in the above Section	Vec
the branchies that this applies to.  Not applicable  12  If appropriate, provide any additional information/context to the answers in this section.  13  14  15  15  16  16  16  17  18  18  18  18  18  18  18  18  18			1100
If appropriate, provide any additional information/content to the answers in this section.   20; independent testing is performed by the internal Audit from the shareholders and on a regular basis by the company auditor	28 a		
Paptropriate, provide any additional information/context to the paptropriate, provide any additional information/context to the answers in this section.  23] Independent teeling is performed by the internal Audit from the sharnholders and on a regular basis by the company auditor.  A. ANT BRISERY & CORPUPTION.  30  Insist the Entity documented policies and procedures on the transport of the paper and complicity.  31  32  Star the Entity sported a designated officer or officers with auditionic repetition-to-experition responsible for coordination the ASC programme?  33  34  35  36  36  37  38  Insist Entity sported a designated officer or officers with auditionic repetition-to-experition responsible for coordination the ASC programme and programmes and processing of anything of value, discisl or induces promising, officing, pulse, solicitation or receiving of anything of value, discisl or induces promising, officing, pulse, solicitation or receiving of anything of value, discisl or induced promising of internal to receiving of internal to the ASC programme and processing of internal to the ASC programmes and the internal processing of the ASC programmes and the ASC programmes and the ASC programmes and the internal processing of the ASC programmes and the internal processing	1.1	the branch/es that this applies to.	Net applicable
the answers in this section.  22; Independent testing is performed by the internal Audit from the ahareholders and on a regular basis by the company auditor  23 Is the Entity documented policies and procedures constant with applicable ADC regulations and requirements to reasonably prevent, detect and report before and composition;  31 Does the Entity have an enterprise wide programme that sets minimum ABC plantador?  32 Constitution of the Company auditor  33 Obes the Entity have adequate staff with appropriate level of experimental reportment operation responsible for coordination the ABC programme?  34 Is the Entity ABC programme and publication or receiving of anything of value, directly or its impropriy intended to influence action or collain an advantages  35 Includes arrelanced requirements regarding interaction violable directly and active and applicable to the Lagal Entity?  36 Does the Entity have cortoo's in place to montror the effectiveness of their ABC programme?  37 Does the Entity have cortoo's prise to montror the effectiveness of their ABC programme?  38 In R. provide the date when the last ABC EWPA was completed.  39 Does the Entity have and ABC residual risk rating that is the not result of the control effectiveness and the interest of the control of effectiveness and their ABC programme?  40 Does the Entity have an ABC residual risk rating that is the not result of the control effectiveness and the interest of the pasty providers as appropriate  40 Does the Entity have an ABC residual risk rating that is the not result of the control effectiveness and the interest of the pasty providers as appropriate  40 Does the Entity have an abcomplete and order thing pasty providers as appropriate  40 Does the Entity have an abcomplete and order thing pasty providers as appropriate  40 Currylion interias associated with the countries and industries in which the Entity does business, directly or through intermediate, Antalogue control of public pasty providers as appropriate  40 Currylion interias associ			The application
the answers in this section.  22; Independent testing is performed by the internal Audit from the ahareholders and on a regular basis by the company auditor  23 Is the Entity documented policies and procedures constant with applicable ADC regulations and requirements to reasonably prevent, detect and report before and composition;  31 Does the Entity have an enterprise wide programme that sets minimum ABC plantador?  32 Constitution of the Company auditor  33 Obes the Entity have adequate staff with appropriate level of experimental reportment operation responsible for coordination the ABC programme?  34 Is the Entity ABC programme and publication or receiving of anything of value, directly or its impropriy intended to influence action or collain an advantages  35 Includes arrelanced requirements regarding interaction violable directly and active and applicable to the Lagal Entity?  36 Does the Entity have cortoo's in place to montror the effectiveness of their ABC programme?  37 Does the Entity have cortoo's prise to montror the effectiveness of their ABC programme?  38 In R. provide the date when the last ABC EWPA was completed.  39 Does the Entity have and ABC residual risk rating that is the not result of the control effectiveness and the interest of the control of effectiveness and their ABC programme?  40 Does the Entity have an ABC residual risk rating that is the not result of the control effectiveness and the interest of the pasty providers as appropriate  40 Does the Entity have an ABC residual risk rating that is the not result of the control effectiveness and the interest of the pasty providers as appropriate  40 Does the Entity have an abcomplete and order thing pasty providers as appropriate  40 Does the Entity have an abcomplete and order thing pasty providers as appropriate  40 Currylion interias associated with the countries and industries in which the Entity does business, directly or through intermediate, Antalogue control of public pasty providers as appropriate  40 Currylion interias associ		1	
the answers in this section.  22; Independent testing is performed by the internal Audit from the ahareholders and on a regular basis by the company auditor  23 Is the Entity documented policies and procedures constant with applicable ADC regulations and requirements to reasonably prevent, detect and report before and composition;  31 Does the Entity have an enterprise wide programme that sets minimum ABC plantador?  32 Constitution of the Company auditor  33 Obes the Entity have adequate staff with appropriate level of experimental reportment operation responsible for coordination the ABC programme?  34 Is the Entity ABC programme and publication or receiving of anything of value, directly or its impropriy intended to influence action or collain an advantages  35 Includes arrelanced requirements regarding interaction violable directly and active and applicable to the Lagal Entity?  36 Does the Entity have cortoo's in place to montror the effectiveness of their ABC programme?  37 Does the Entity have cortoo's prise to montror the effectiveness of their ABC programme?  38 In R. provide the date when the last ABC EWPA was completed.  39 Does the Entity have and ABC residual risk rating that is the not result of the control effectiveness and the interest of the control of effectiveness and their ABC programme?  40 Does the Entity have an ABC residual risk rating that is the not result of the control effectiveness and the interest of the pasty providers as appropriate  40 Does the Entity have an ABC residual risk rating that is the not result of the control effectiveness and the interest of the pasty providers as appropriate  40 Does the Entity have an abcomplete and order thing pasty providers as appropriate  40 Does the Entity have an abcomplete and order thing pasty providers as appropriate  40 Currylion interias associated with the countries and industries in which the Entity does business, directly or through intermediate, Antalogue control of public pasty providers as appropriate  40 Currylion interias associ	29	If appropriate, provide any additional information/context to	
company auditor  ANTI BRIBERY & CORRUPTION  1 Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report (ABCANY, and controllor).  21 Interest of the Controllor of the Con			
A. ANT BRIERY & CORRUPTION  30  Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribary, and compution?  31  32 Does the Entity have an enterprise wide programme that eath continues and computions with auditionit experimental experiment and efficient on efficient with auditionit experiment ex			
193 Has the Entity Apocumented policies and procedures consistent with applicable ABC regulations and requirements to reasonably provent, detect and report bribary, and comulation?  194 Does the Entity have an enterprise wide programme that est minimum ABC detaindards?  195 Has the Entity appointed a designated officer or officers constitution than ABC programme?  296 Dees the Entity have adequate staff with appropriate levels of experience/experted to implement the ABC programme?  297 Obes the Entity have a global ABC policy that:  298 Proceedings of the Entity ABC programma applicable to:  299 Not Applicable  290 Ones the Entity have a global ABC policy that:  290 Includes promising, offering, slying, solicitation or receiving of anything of value, directly of indirectly, of improprise of value, directly of value, directly of value, directly of value, directly of value, of indirectly, of improprise of value, directly of value, directly of value, directly of value, of indirectly, of improprise of value, of indirectly, of improprise of value, of indirectly, of			
193 Has the Entity Apocumented policies and procedures consistent with applicable ABC regulations and requirements to reasonably provent, detect and report bribary, and comulation?  194 Does the Entity have an enterprise wide programme that est minimum ABC detaindards?  195 Has the Entity appointed a designated officer or officers constitution than ABC programme?  296 Dees the Entity have adequate staff with appropriate levels of experience/experted to implement the ABC programme?  297 Obes the Entity have a global ABC policy that:  298 Proceedings of the Entity ABC programma applicable to:  299 Not Applicable  290 Ones the Entity have a global ABC policy that:  290 Includes promising, offering, slying, solicitation or receiving of anything of value, directly of indirectly, of improprise of value, directly of value, directly of value, directly of value, directly of value, of indirectly, of improprise of value, directly of value, directly of value, directly of value, of indirectly, of improprise of value, of indirectly, of improprise of value, of indirectly, of	A ANTI DO	PIREDY & CORRUPTION	]
consistent with applicable ABC regulations and requirements to researchly provent, detect and report bibliary and connation?  1 Does the Entity have an enterprise wide programme that sets minimum ABC standards?  2 with sufficient reported propries of tillions of tillions with a standards?  3 Does the Entity have and eduquate staff with appropriate levele of experience/expertites to implement the ABC programme?  3 Does the Entity have and eduquate staff with appropriate levele of experience/expertites to implement the ABC programme?  34 Is the Entity ABC programme applicable to: 35 Does the Entity have and post and post of the Entity and an advantage of the Entity intended to influence action or obtain an advantage of the Entity intended to influence action or obtain an advantage of the Entity intended to influence action or obtain an advantage of the Entity intended to influence action or obtain an advantage of the Entity intended to influence action or obtain an advantage of the Entity intended to influence action or obtain an advantage of the Entity intended to influence action or obtain an advantage of the Entity intended to influence action or obtain an advantage of the Entity intended to influence action or obtain an advantage of the Entity and the Entity and the Entity of the En	L		
requirements to reasonably prevent, detect and report biblary and connuclion.  31 Does the Entity have an enterprise wide programme that ests miniman AG2 bandards?  32 Has the Entity appointed a designated officer or officers with auditional experimence operation responsible for visit and inclination experimence operation responsible for visit of experimence operation experts and with appropriate levels of experimence operation experts and with appropriate levels of experimence operation experts that was a proposed to the experimence of experimence operation of experimence operations and experiment of the experimence of experimence operations and experiment of experimence of experimence operations and experiment of exper	30		
Indiana   Indi			Yes
Set imimum AGC gardardis?  22 Has the Entity appointed a designated officer or officers with sufficient experience/experience specialistic for coordination the AGC programme?  33 Desi the Entity Ago adequate staff with appropriate levels of experience/e			
sets minimum ABC standards?  2 Has the Entity sported a designated officer or officers with sufficient experience/expertise responsible for coordination the ABC programme?  3 Does the Entity have a dequate slaft with appropriate level of experience/expertise to implement the ABC programme?  3 Does the Entity have a alpibal ABC programme applicable to proceeding of the Prohibits the giving and neceiving of briber? This includes promising, officency, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly interedied to rindurce activity, if improperly interedied to rindurce activity of the provision of the standard and advantage.  3 Does the Entity have controts in place to monitor the effectiveness of their ABC programme?  3 Does the Entity have controts in place to monitor the effectiveness of their ABC programme?  4 Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  5 Does the Entity have an ABC residual risk rating that is the ent result of the controls effectiveness and the inherent risk completed.  40 Does the Entity have an ABC residual risk rating that is the ent result of the controls effectiveness and the inherent risk components detailed below.  40 Does the Entity ABC EWRA cover the inherent risk components detailed below.  40 Does the Entity ABC EWRA cover the inherent risk components detailed below.  40 Does the Entity ABC EWRA cover the inherent risk components detailed below.  40 Does the Entity ABC EWRA cover the inherent risk components detailed below.  40 Does the Entity ABC EWRA cover the inherent risk components detailed below.  40 Does the Entity ABC EWRA cover the inherent risk components of the entities of the countries and industries in which the Entity does business, dire	31		V
with sufficient experience/expertise responsible for coordinating the ABC programme?  33 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?  34 Is the Entity's ABC programme applicable to:  35 Does the Entity have a global ABC policy that:  36 Prohibits the giving and receiving of bribers? This includes promising, offering, giving, solicitation or receiving of anything of value, directly, if improperly intended to influence action or obtain an advantage.  35 b Includes prohibits negarist the falsification of books and records (this may be within the ABC policy or any other policy explicabile to the Legal Entity)?  36 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  37 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  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 not result of the controls effectiveness and the inferent risk sessesment (EWRA) been completed in the last IZ monthe?  40 December 10 Does the Season and Policy on the place to the Complete place to the Policy on the place to the Policy on the season place to the Policy on the Policy on the Policy on the season place to the Policy on the Policy	1 1	sets minimum ABC standards?	Yes
with sufficient experience/expertise responsible for coordinating the ABC programme?  33 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?  34 Is the Entity's ABC programme applicable to:  35 Does the Entity have a global ABC policy that:  36 Prohibits the giving and receiving of bribers? This includes promising, offering, giving, solicitation or receiving of anything of value, directly, if improperly intended to influence action or obtain an advantage.  35 b Includes prohibits negarist the falsification of books and records (this may be within the ABC policy or any other policy explicabile to the Legal Entity)?  36 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  37 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  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 not result of the controls effectiveness and the inferent risk sessesment (EWRA) been completed in the last IZ monthe?  40 December 10 Does the Season and Policy on the place to the Complete place to the Policy on the place to the Policy on the season place to the Policy on the Policy on the Policy on the season place to the Policy on the Policy	32	Has the Entity appointed a designated officer or officers	
Does the Entity have adequate staff with appropriate levels of experience/expectate to implement the ABC programme?  34 Is the Entity's ABC programme applicable to: Not Applicable 55 Does the Entity have a global ABC policy that: Includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.  35 b Includes a prohibition against the falsification of books and records (this map be within the ABC policy or any other policy applicable to the Legal Entity)?  36 Includes a prohibition against the falsification of books and records (this map be within the ABC policy or any other policy applicable to the Legal Entity)?  36 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  37 Does the Doard receive, assess, and challenge regular reporting on the estatus of the ABC programme?  38 Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last I am ontities.  39 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk yes assessment.  40 Does the Entity rested by intermediaries and other third party providers as appropriate.  41 Description in the state of the ABC programme?  42 Does the Entity's ABC EVRA accept the inherent risk yes assessment.  43 Does the Entity rested by intermediaries and other third party providers as appropriate.  44 Description risks associated with the countries and industries in within the Entity does business, directly or through intermediaries.  45 Description risks associated with gifts and hospitality, hingrinformships, charable donations and political hingrinformships, charable donations and political hingrinformships.		with sufficient experience/expertise responsible for	Yes
of experience/expertise to implement the ABC programme?  34 Is the Entity a ABC programme applicable to: Not			
34 is the Entity's ABC programme applicable to: 35 Oces the Entity have a global ABC policy that: 36 Prohibit the glying and receiving of antitying and receiving of antitying of value, griently or indirectly, if improperly intended to influence action or obtain an advantage 35 includes enhanced requirements regarding interaction with public officials? 36 includes enhanced requirements regarding interaction with public officials? 37 includes enhanced requirements regarding interaction with public officials? 38 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)? 38 d 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)? 39 Does the Entity have cortrols in place to monitor the effectiveness of their ABC programme? 30 Does the Entity have cortrols in place to monitor the effectiveness of their ABC programme? 31 Als the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? 30 If N, provide the date when the last ABC EWRA was completed. 31 If N, provide the date when the last ABC EWRA was completed. 32 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? 40 Does the Entity to a BC EWRA cover the inherent risk components detailed below: 41 Oces the Entity to a support the components detailed below: 42 Oces the Entity is as appropriate 43 Oces the Entity to a support the Entity does business, directly or through intermediaries as appropriate in the Entity does business, directly or through intermediaries. A confidence that involve state-controlled entities or public officials. 44 Oce Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials.	33		
St. the Entity's ABC programme applicable to: Not Applicable			Yes
Oes the Entity have a global ASC policy that:  The prohibits the global particle provided in the property intended to influence action or obtain an advantage.  The provided in the provided influence action or obtain an advantage.  The provided influence action of books and records (files may be within the ASC policy or any obtained of their ASC programme?)  The provided influence action of the effectiveness of their ASC programme?  The provided influence action of the effectiveness of their ASC programme?  The provided influence action of the effectiveness of their ASC programme?  The provided influence action of the effectiveness of their ASC programme?  The provided influence action of the effectiveness of their ASC programme?  The provided influence action of the effectiveness and the influence in action of the effectiveness and effectiveness and eff			Not Applicable
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.			Not Applicate
includes promising, offering, glving, solicitation or receiving of anything of value, directly or influence action or obtain an advantage.  35 b Includes enhanced requirements regarding interaction with public officials?  36 c Includes a prohibition against the fabilitication of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity?)  36 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  37 Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  38 Has the Entity's ABC Enterprise Wide Flack Assessment (EWRA) been completed in the last 12 monitor?  40 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk components detailed below:  40 a Potential liability created by intermediaries and other third party providers as appropriate  40 Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries. Products or services, including those that involve state-owned or state-controlled entities or public officials  40 Corruption risks associated with the countries and influstries in which the Entity does business, directly or through intermediaries. Products or services, including those that involve state-owned or state-controlled entities or public officials  40 Corruption risks associated with the public officials  40 Corruption risks associated with openitality. Pres			
receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.  1 includes enhanced requirements regarding interaction with public officials?  2 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)?  36 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  37 Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  38 Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  38 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?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 Does the Entity's ABC EWRA cover the inherent risk and industries in which the Entity does business, directly or through intermediaties as associated with the countries and industries in which the Entity does business, directly or through intermediaties.  40 Corruption risks associated with entities or public officials  40 Corruption risks associated with entities or public officials  40 Corruption risks associated with entities or public officials  40 Corruption risks associated with entities or public officials	35 a		· I
improperly intended to influence action or obtain an advantance advantance and advantance with public officials?  Includes enhanced requirements regarding interaction with public officials?  Includes a prohibition against the falsification of books and records (this may be within the AGC policy or any other policy applicable to the Legal Entity;)  Does the Entity have controls in place to monitor the effectiveness of their AGC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk components detailed below.  Does the Entity's ABC EWRA cover the inherent risk components detailed below.  Does the Entity's ABC EWRA cover the inherent risk components detailed below.  Does the Entity's ABC EWRA cover the inherent risk components detailed below.  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries or public officials.  Does the Corruption risks associated with the countries or through intermediaries or public officials.  Corruption risks associated with gifts and hospitality, highlighteenthys, chafflable donations and political withing intermitys, chafflable donations and political		receiving of anything of value, directly or indirectly, if	Yes
advantage Includes enhanced requirements regarding interaction with public officials?  Includes prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Bas Has the Entity ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity SABC EWRA cover the inherent risk components detailed below.  40 Does the Entity sagnopriate  Potential liability created by intermediaries and industries in which the Entity does business, directly or through intermediaries.  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries.  Corruption risks associated with gifts and hospitality, intringrintemships, charitable donations and political hinging/intemships, charitable donations and political			
with public officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  36 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  37 Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  38 Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  38 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 sessessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 Potential liability created by intermediaries and other third party providers as appropriate  40 Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries.  40 Carrance and the Entity does business, directly or through intermediaries.  40 Carrance and the Entity does business, directly or through intermediaries.  40 Corruption risks associated with gifts and hospitality, highlightnesships, charitable donations and political highlightnesships, charitable donations and political		improperly intended to influence action or obtain an	•
as a provide officials?  Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Be the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  The site Entity ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  In provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk components detailed below.  Does the Entity's ABC EWRA cover the inherent risk components detailed below.  Does the Entity's ABC EWRA cover the inherent risk components detailed below.  Does the Entity's ABC EWRA cover the inherent risk components detailed below.  Does the Entity's ABC EWRA cover the inherent risk components detailed below.  The components detailed below.  Does the Entity's ABC EWRA cover the inherent risk components detailed below.  The co			
and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  36 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  37 Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  38 Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  38 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?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below.  40 Potential liability created by intermediaries and other third party providers as appropriate  40 Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries. products or services, including those that involve state-cowned or state-controlled entities or public officials  40 Corruption risks associated with gifts and hospitality, hiring/intermiships, charitable donations and political  40 Corruption risks associated with gifts and hospitality, hiring/intermiships, charitable donations and political	35 b	advantage	Vec
other policy applicable to the Legal Entity)?  Yes  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity ABC EWRA cover the inherent risk components detailed below:  Does the Entity ABC EWRA cover the inherent risk components detailed below:  Does the Entity as associated with the countries and industries in which the Entity does business, directly or through intermediaries.  Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials  Corruption risks associated with gifts and hospitality, hiring/intermships, charitable donations and political  Yes	35 b	advantage Includes enhanced requirements regarding interaction with public officials?	Yes
36 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  37 Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  38 Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  39 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?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 Potential liability created by intermediaries and other third party providers as appropriate  40 Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 Transactions, products or services, including those that involved the intermediaries and holitical risks associated with gifts and hospitality, hiring/intermships, charitable donations and political		advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books	Yes
effectiveness of their ABC programme?  Tes  To Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Ras the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  2020  39 Does the Entity have an ABC residual risk rating that is the ner result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 a Potential fability created by intermediaries and other third party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-cometrolled entities or public officials  40 d Corruption risks associated with gifts and hospitality, hiring/intermships, chantable donations and political  Yes		advantage includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any	
effectiveness of their ABC programme?  Tes  To Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Ras the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  2020  39 Does the Entity have an ABC residual risk rating that is the ner result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 a Potential fability created by intermediaries and other third party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-cometrolled entities or public officials  40 d Corruption risks associated with gifts and hospitality, hiring/intermships, chantable donations and political  Yes		advantage includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any	
effectiveness of their ABC programme?  Tes  To Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Ras the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  2020  39 Does the Entity have an ABC residual risk rating that is the ner result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 a Potential fability created by intermediaries and other third party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-cometrolled entities or public officials  40 d Corruption risks associated with gifts and hospitality, hiring/intermships, chantable donations and political  Yes		advantage includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any	
reporting on the status of the ABC programme?  38 Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  No  38 a If N, provide the date when the last ABC EWRA was completed.  2020  39 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below: 40 a Potential liability created by intermediaries and other third party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries 40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials  40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political  Yes	35 c	advantage includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  2020  39 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 a Potential liability created by intermediaries and other third party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials  40 d Corruption risks associated with gifts and hospitality, hing/internships, charitable donations and political  40 d Corruption risks associated with gifts and hospitality, hing/internships, charitable donations and political	35 c	advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
(EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  2020  39 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 a Potential liability created by intermediaries and other third party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials  40 d Corruption risks associated with gifts and hospitality, hiring/intermships, charilable donations and political  40 d Corruption risks associated with gifts and hospitality, hiring/intermships, charilable donations and political	35 c	advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular	Yes Yes
38 a If N, provide the date when the last ABC EWRA was completed.  2020  39 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 a Potential liability created by intermediaries and other third party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials  40 d Corruption risks associated with gifts and hospitality, hiring/intermships, charitable donations and political  40 d Corruption risks associated with gifts and hospitality, hiring/intermships, charitable donations and political  40 d Yes	35 c	advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular	Yes Yes
38 a If N, provide the date when the last ABC EWRA was completed.  2020  39 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 a Potential liability created by intermediaries and other third party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials  40 d Corruption risks associated with gifts and hospitality, hiring/intermships, charitable donations and political  40 d Corruption risks associated with gifts and hospitality, hiring/intermships, charitable donations and political  40 d Yes	36 37	advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment	Yes Yes
2020  39 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 a Potential liability created by intermediaries and other third party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials  40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political	36 37	advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment	Yes Yes
2020  39 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 a Potential liability created by intermediaries and other third party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials  40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political	36 37	advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment	Yes Yes
2020  39 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 a Potential liability created by intermediaries and other third party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials  40 d Corruption risks associated with gifts and hospitality, hiring/intermships, charitable donations and political  Yes	35 c 36 37 38	advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes Yes
net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 a Potential liability created by intermediaries and other third party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials  40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political  Yes	35 c 36 37 38	advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.	Yes Yes Yes No
net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 a Potential liability created by intermediaries and other third party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials  40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political  Yes	35 c 36 37 38	advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.	Yes Yes Yes No
net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 a Potential liability created by intermediaries and other third party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials  40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political  Yes	35 c 36 37 38	advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.	Yes Yes Yes No
assessment?  40 Does the Entity ABC EWRA cover the inherent risk components detailed below:  40 a Potential liability created by intermediaries and other third party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-cowned or state-controlled entities or public officials  40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political  47 yes	35 c 36 37 38	advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.	Yes Yes Yes No
Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 a Potential liability created by intermediaries and other third party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials  40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political  Yes	35 c 36 37 38	advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the	Yes Yes Yes No 2020
components detailed below:  40 a Potential liability created by intermediaries and other third party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials  40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political  Yes	35 c 36 37 38	advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk	Yes Yes Yes No 2020
40 a Potential liability created by intermediaries and other third party providers as appropriate 40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries 40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials 40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political	35 c  36  37  38  38 a	advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes Yes Yes No 2020
party providers as appropriate  40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials  40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political  Yes	35 c  36  37  38  38 a	advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity ABC EWRA cover the inherent risk	Yes Yes Yes Yes No 2020
40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-controlled entities or public officials  40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political  Yes	35 c  36  37  38  38 a  39	advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity ABC EWRA cover the inherent risk	Yes Yes Yes Yes No 2020
industries in which the Entity does business, directly or through intermediaries  40 c Transactions, products or services, including those that involve state-controlled entities or public officials  40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political  Yes	35 c  36  37  38  38 a  39	advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-	Yes Yes Yes Yes No 2020
40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials  40 d Corruption risks associated with gifts and hospitality, hiring/intemships, charitable donations and political Yes	35 c  36  37  38  38 a  39  40  40 a	advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third- party providers as appropriate	Yes Yes Yes Yes No 2020
involve state-owned or state-controlled entities or public officials  40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political Yes	35 c  36  37  38  38 a  39  40  40 a	advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Potential liability created by intermediaries and other third party providers as appropriate Corruption risks associated with the countries and	Yes Yes Yes Yes No 2020 Yes
do d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political Yes	35 c  36  37  38  38 a  39  40  40 a  40 b	advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Potential liability created by intermediaries and other third party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes Yes Yes Yes No 2020 Yes
40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political Yes	35 c  36  37  38  38 a  39  40  40 a  40 b	advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Potential liability created by intermediaries and other third- party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  Transactions, products or services, including those that	Yes Yes Yes No 2020 Yes Yes Yes
hiring/intemships, charitable donations and political Yes	35 c  36  37  38  38 a  39  40  40 a  40 b	advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Potential liability created by intermediaries and other third party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  Transactions, products or services, including those that involve state-owned or state-controlled entities or public	Yes Yes Yes No 2020 Yes Yes Yes
	35 c  36  37  38  38 a  39  40  40 a  40 b	advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third- party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes Yes Yes No 2020 Yes Yes Yes
+ controlutions	35 c  36  37  38  38 a  39  40  40 a  40 b	advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third- party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials  Corruption risks associated with gifts and hospitality,	Yes Yes Yes No 2020 Yes Yes Yes Yes
	35 c  36  37  38  38 a  39  40  40 a  40 b	advantage Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third- party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials  Corruption risks associated with gifts and hospitality, hiring/intermships, charitable donations and political	Yes Yes Yes No 2020 Yes Yes Yes Yes

40 d	Corruption risks associated with gifts and hospitality,	
	hiring/internships, charitable donations and political	Yes
	contributions	
40 e	Changes in business activities that may materially	
40 e		Yes
	increase the Entity's corruption risk	
41	Does the Entity's internal audit function or other	•
	independent third party cover ABC Policies and	Yes Yes
	Procedures?	
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities	Aliah A Sanka
	subject to ABC risk have been outsourced	Not Applicable
42 f	Non-employed workers as appropriate	
461	(contractors/consultants)	No
43	Does the Entity provide ABC training that is targeted to	Yes
	specific roles, responsibilities and activities?	
44	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	168
44 a	If N, clarify which questions the difference/s relate to and	
77 u	the branch/es that this applies to.	
	the brancives that this applies to.	Not applicable
		The approach
45	If appropriate, provide any additional information/context to	42e : CACEIS BANK doesn't have outsourced compliance activities
	the answers in this section.	38: An ABC risk assessment is done annually via the update of the operational risk mapping
		42f : Providers are required to train their own workers.
		Tel 17 fortage de requise to train des services
5. AML.	CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
-10	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
	Are the Entity's policies and procedures updated at least	100
47		Yes
	annually?	
48	Has the Entity chosen to compare its policies and	
	procedures against:	
48 a	U.S. Standards	Yes
48 a1	If Y, does the Entity retain a record of the results?	Yes
***************************************	; i account citing formit a record of the results?	
48 b	F11 Ctenderale	
48 b1	EU Standards	Yes
	If Y, does the Entity retain a record of the results?	
49	If Y, does the Entity retain a record of the results?  Does the Entity have policies and procedures that:	Yes
	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	Yes Yes
49	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	Yes
49 49 a	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 Yes Yes
49	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	Yes Yes
49 49 a 49 b	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 Yes Yes
49 49 a	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	Yes Yes Yes Yes Yes
49 49 a 49 b	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 Yes Yes
49 49 a 49 b	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	Yes Yes Yes Yes Yes
49 49 a 49 b 49 c 49 d	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 accounts/relationships with shell banks	Yes Yes Yes Yes Yes Yes Yes
49 49 a 49 b 49 c	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 accounts/relationships with shell banks  Prohibit dealing with another entity that provides services	Yes Yes Yes Yes Yes Yes
49 49 a 49 b 49 c 49 d 49 e	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 accounts/relationships with shell banks  Prohibit dealing with another entity that provides services to shell banks	Yes Yes Yes Yes Yes Yes Yes
49 49 a 49 b 49 c 49 d	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 accounts/relationships with shell banks  Prohibit dealing with another entity that provides services to shell banks  Prohibit opening and keeping of accounts for Section 311	Yes Yes Yes Yes Yes Yes Yes Yes Yes
49 49 a 49 b 49 c 49 d 49 d 49 f	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 accounts/relationships with shell banks  Prohibit dealing with another entity that provides services to shell banks  Prohibit opening and keeping of accounts for Section 311 designated entities	Yes Yes Yes Yes Yes Yes Yes
49 49 a 49 b 49 c 49 d 49 d 49 f	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 accounts/relationships with shell banks  Prohibit dealing with another entity that provides services to shell banks  Prohibit opening and keeping of accounts for Section 311	Yes Yes Yes Yes Yes Yes Yes Yes Yes
49 49 a 49 b 49 c 49 d 49 e	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 accounts/relationships with shell 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 any of	Yes
49 49 a 49 b 49 c 49 d 49 d 49 f	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 accounts/relationships with shell 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 any of unlicensed/unregulated remittance agents, exchanges	Yes Yes Yes Yes Yes Yes Yes Yes Yes
49 49 a 49 b 49 c 49 d 49 d 49 f	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 accounts/relationships with shell 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 any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money	Yes
49 49 a 49 b 49 c 49 d 49 e 49 f 49 g	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 accounts/relationships with shell 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 any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
49 49 a 49 b 49 c 49 d 49 d 49 f	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 accounts/relationships with shell 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 any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents  Assess the risks of relationships with domestic and	Yes
49 49 a 49 b 49 c 49 d 49 e 49 f 49 g	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 accounts/relationships with shell 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 any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
49 49 a 49 b 49 c 49 d 49 e 49 f 49 g	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 accounts/relationships with shell 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 any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents  Assess the risks of relationships with domestic and	Yes
49 d 49 d 49 c 49 d 49 d 49 e 49 f 49 g	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 accounts/relationships with shell 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 any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents  Assess the risks of relationships with domestic and	Yes

49 i	Define the process for escalating financial crime risk	Voa '
	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	
49 K	reasons that applies across the entity, including foreign	Yes
	branches and affiliates	1.00
49 I	Define the process and controls to identify and handle	
431	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	No.
	"watchlists"	Yes .
50	Has the Entity defined a risk tolerance statement or similar	
	document which defines a risk boundary around their	Yes
	business?	
51	Does the Entity have record retention procedures that	Yes
51 a	comply with applicable laws?  If Y, what is the retention period?	
51 H	ii 1, wisat is the retention perious	
		5 years or more
	•	
52	Confirm that all responses provided in the above Section	Yes
52 a	are representative of all the LE's branches  If N, clarify which questions the difference/s relate to and	
52 a	the branch/es that this applies to.	
	the prancives martins applies to.	Not Applicable
53	If appropriate, provide any additional information/context to	48a : Concems oly the process an procedures applicable ti Nex York representative office
	the answers in this section.	49k : A dedicated Committee validates the exiting of clients
		49 n: The maintenance of internal watchlists is made at CACEIS Bank parent company level (Credit Agricole SA)
	F & SANCTIONS RISK ASSESSMENT	
6: AML, CT	Does the Entity's AML & CTF EWRA cover the inherent	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Von
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client	Yes Voc
54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product	Yes
54 a 54 b 54 c	Does the Enlity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Yes
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography	Yes
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls	Yes Yes
54 a 54 b 54 c 54 d 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography	Yes Yes
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes Yes Yes
54 a 54 b 54 c 54 d 55	Does the Enlity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Enlity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes Yes Yes Yes
54 a 54 a 54 b 54 c 54 d 55 a 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 Menitoring Customer Due Dilligence PEP Identification Transaction Screening	Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 c 55 d 55 a 55 b 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 Dilligence PEP Identification	Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes
54 a 54 a 54 b 54 c 54 d 55 65 65 a 55 b 55 c 65 d 55 e 65 f 55 g	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dilligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 65 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 a 54 b 54 c 54 d 55 65 65 a 55 b 55 c 65 d 55 e 65 f 55 g	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 65 d 55 e  55 f 55 g 55 h	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dilligence 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	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dilligence 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	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 65 d 55 c 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 moniths?  If N, provide the date when the last AML & CTF EWRA was completed.	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.	Yes
54 a 54 b 54 c 54 d 55 c 55 d 55 c 55 d 55 f 55 g 55 h 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.	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 g 55 h 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP identification Transaction Screening Name Screening against Adverse Media/Negative News  Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 b 55 c 55 d 55 d 55 c 55 d 5	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 Dilligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News  Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 f 56 a 57 a 57 a 57 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 b 55 c 55 d 55 d 55 c 55 d 5	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 Dilligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 c 55 f 55 g 55 h 56 56 a 57 a 57 b 57 c 57 d 58	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 moniths? 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 c 55 d 55 c 55 f 55 g 55 f 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 fast 12 moniths? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 d 55 g 55 f 56 a 57 a 57 a 57 a 57 c 57 d 58 a 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 f 55 g 55 h 56 a  57 a 57 a 57 a 57 a 58 a 58 a 58 a 58 a 58 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance List Management	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 d 55 a 55 f 55 g 55 h 56 a 57 a 57 a 57 a 57 c 57 d 58 a 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

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.	Not applicable
61	If appropriate, provide any additional information/context to the answers in this section.	54 : The AML CFT framework is reviewed by the Internal Audit on a annual basis. The AML CFT EWRA is carried out on a annual basis using the French regulatory questionnaire QLB (Questionnaire Lutte Antiblanchiment) and covers the parent company and its subisdiaries and branches
	DD and EDD Does the Entity verify the identity of the customer?	Yes
62 63	Do the Entity's policies and procedures set out when CDD	
00	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 Product usage	Yes Yes
64 e 64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?  Does the due diligence process result in customers	25%
	receiving a risk classification?  If Y, what factors/criteria are used to determine the	Yes
67 a	customer's risk classification? Select all that apply:	
67 a1 67 a2	Product Usage Geography	Yes Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	No
68 a	If Y, is this at:	
68 a1	Onboarding	
68 a2	KYC renewal	was a second and a second a second and a second a second and a second
68 a3	Trigger event	
68 a4 68 a4a	Other  If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes .
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 B	If yes, select all that apply:	
74 a1	Less than one year	No
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	Yes
74 85	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	O74a, Q74a1, Q74a2, Q74a3, Q74a5: - every year: high risk clients (legal entitles and individuals) - every 3 years : standard risk clients (legal entitles) - evry 5 years : standard risk clients (Individuals) - every 7 years : low risk clients (legal entitles)
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Always subject to EDD
76 b	Respondent Banks	Always subject to EDD
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	Always subject to EDD
76 d	Extractive industries	Always subject to EDD
76 e	Gambling customers	Always subject to EDD
76 f	General Trading Companies	Always subject to EDD
76 g	Marijuana-related Entitles	Always subject to EDD
76 h	MSB/MVTS customers	Prohibited
76 i	Non-account customers	Always subject to EDD
76 i	Non-Government Organisations	Always subject to EDD
76 k	Non-resident customers	Always subject to EDD
76 I	Nuclear power	Always subject to EDD
76 m	Payment Service Providers	Always subject to EDD
76 n	PEPs	Always subject to EDD
76 o	PEP Close Associates	Always subject to EDD
76 p	PEP Related	Always subject to EDD
76 q	Precious metals and stones	Always subject to EDD
76 r	Red light businesses/Adult entertainment	Do not have this category of customer or industry
76 s	Regulated charities	Always subject to EDD
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	Do not have this category of customer or industry
76 v	Unregulated charities	Always subject to EDD
76 w	Used Car Dealers	Do not have this category of customer or industry
76 x	Virtual Asset Service Providers	Do not have this category of customer or industry
76 y	Other (specify)	·
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/or compliance approval?	Yes
	1	

78 a	If Y indicate who provides the approval:	Both
79	Does the Entity have specific procedures for onboarding	
		No
	accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or quality review on clients 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.	Q64e, Q67a1 : if applicable Q68 : High risk clients are funds located in HR countries but managed by regulated Manco in low risk country
		Q 72: Manual PEP screening on the customer base is performed prior to the entry into relationship and the
		customer base is screened on a daily basis through our screening tool.
e MONITO	RING & REPORTING	
BS WICHTED	Does the Entity have risk based policies, procedures and	
03	monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor	Combination of automated and manual
	transactions for suspicious activities?	
84 a	If manual or combination selected, specify what type of transactions are monitored manually	Manual monitoring is necessary when the source of the triggering event cannot be integrated into the automatic tool
		(example: external alert).
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Vendor-sourced tools
84 b1	If 'Vendor-sourced too!' or 'Both' selected, what is the	
	name of the vendor/tool?	
		After Data
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	<1 year
85	Does the Entity have regulatory requirements to report	Yes
05 -	suspicious transactions?  If Y, does the Entity have policies, procedures and	
85 a	processes to comply with suspicious transaction	Yes
•	reporting requirements?	
86	Does the Entity have policies, procedures and processes	
	to review and escalate matters arising from the monitoring	Yes
	of customer transactions and activity?	·
87	Does the Entity have a data quality management	
	programme to ensure that complete data for all	Yes
	transactions are subject to monitoring?	
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a	Yes
	timely manner?	100
89	Does the Entity have processes in place to send Requests	
-	for information (RFIs) to their customers in a timely	Yes
	manner?	
90	Confirm that all responses provided in the above Section	Yes
90 a	are representative of all the LE's branches  If N, clarify which questions the difference/s relate to and	
vv a	the branch/es that this applies to	
		,
91	If appropriate, provide any additional information/context to	
• •	the answers in this section.	
Q DAVMEN	T TRANSPARENCY	I
92	Does the Entity adhere to the Wolfsberg Group Payment	
· .	Transparency Standards?	Yes
	1	

93 a FATFF 93 b Local F 93 c If N, ex  94 Does the required message 95 a If Y, do benefic payme 96 Confirm are represented find the bra  97 If appropriate answers foreign find answers foreign find taken to other entical juris  100 Does the reasonat taken to other entical juris 100 Does the reasonat taken to stripping, relevant  101 Does the reasonat taken to stripping relevant  102 a If auto 102 at Are in 102 at the match the matc	s the Entity have policies, procedures and processes imply with and have controls in place to ensure obliance with:  TF Recommendation 16 cal Regulations Y, specify the regulation	Yes Yes European regulation 2015/847
93 a FATF F 93 b Local F 93 b Local F 93 b Local F 93 b If Y, S  94 Does the required border pays are represented for the brain service of the brain service	TF Recommendation 16 cal Regulations Y, specify the regulation	Yes
93 b Local F 93 b1 if Y, s 93 b1 if Y, s 93 c if N, ex 94 Does the required border p; 95 Does the required message message if Y, do benefic payment for the bra 96 Confirm are represented the bra 97 if appropriate answers foreign fit manager applicable business foreign fit manager applicable business foreign fit message in the bra 100 Does the reasonal taken to stripping, relevant to stripping, relevant 101 Does the ownersh onboardid Lists? 102 What is the screen in the match the ma	cal Regulations Y, specify the regulation	Yes
93 b1  If Y, s  93 c  If N, ex  94  Does the required border ps  95  Does the required message  95 a  If Y, do benefic paymer  96  Conlimit are represent the bra  97  If appropher and the bra  10. SANCTIONS  98  Does the manager applicable business foreign file of the controls entity's a entity s	Y, specify the regulation	
94 Does the required border pp. 95 Does the required message 95 a If Y, do benefit paymer 96 Confirm are represented in the brain series of the br		European regulation 2015/847
94 Does the required border pp 95 Does the required message 95 a If Y, do benefic paymer 96 Confirm are represented in the bra 100. SANCTIONS 98 Does the manager applicable business foreign fit of the bra 100 Does the reasonal taken to stripping, relevant 101 Does the ownersh onboardid Lists? 102 What is 1 screenin 102 a If auto 102 a1 Are in 102 a1 Are in 102 a2 What match the result of the	i, explain	
required border pp posterior pp		
required message 95 a If Y, do benefic payme; 96 Confirm I are represented in the bra service of the bra ser	s the Entity have controls to support the inclusion of ired and accurate originator information in cross er payment messages?	Yes
benefic paymen  96 Confirm to a represent the bra  97 If approphen the answer	s the Entity have controls to support the inclusion of ired beneficiary information cross-border payment sages?	Yes
96 Confirm are represented by the brain and the brain are represented by the answer applicable by the answer are represented by the area of the brain are represented by the brain area of the bra	, does the Entity have procedures to include neficiary address including country in cross border yments?	Yes
96 a If N, clathe bra  97 If appropriate answers  10. SANCTIONS  98 Does the manager applicable business foreign firms and the controls entity's a entity's a entity to other entity to other entity to other entity and taken to stripping, relevant  101 Does the reasonal taken to stripping, relevant  102 What is 1 screenin  102 a1 Are in 102 a1 If a the	irm that all responses provided in the above Section	Yes
10. SANCTIONS  98 Does the manager applicable business foreign fire controls entity's a	epresentative of all the LE's branches	
10. SANCTIONS 98 Does the manager applicable business foreign fi 99 Does the controls entity's a entity to other ent focal juris 100 Does the reasonal taken to stripping, relevant 101 Does the ownersh onboard Lists? 102 What is 1 screenin 102 a1 Are it 102 a1a If a the	<ul> <li>clarify which questions the difference/s relate to and branch/es that this applies to.</li> </ul>	
98 Does the manager applicable business foreign file of the controls and the control	propriate, provide any additional information/context to unswers in this section.	
98 Does the manager applicable business foreign file of the confrols and t		
manager applicable business foreign fi per		
controls entity's a entity to when the controls entity to a entity to other entity for the control of the contr	s the Entity have a Sanctions Policy approved by agement regarding compliance with sanctions law icable to the Entity, including with respect to its ness conducted with, or through accounts held at gn financial institutions?	Yes
reasonal taken to stripping, relevant  101 Does the ownersh onboard Lists? 102 What is 1 screenin 102 a If 'auto 102 a1 Are ir 102 a1a If a the	s the Entity have policies, procedures, or other rols reasonably designed to prevent the use of another y's accounts or services in a manner causing the other y to violate sanctions prohibitions applicable to the r entity (including prohibitions within the other entity's jurisdiction)?	
ownersh onboardi Lists? 102 What is t screenin 102 a If 'autoi 102 a1 Are ir 102 a1a If a the	s the Entity have policies, procedures or other controls onably designed to prohibit and/or detect actions on evade applicable sanctions prohibitions, such as ping, or the resubmission and/or masking, of sanctions and information in cross border transactions?	
102 What is t screenin 102 a If autoi 102 a1 Are in 102 a1a If a the 102 a2 When match the m 'Other	s the Entity screen its customers, including beneficial ership information collected by the Entity, during parding and regularly thereafter against Sanctions	Yes
102 a1 Are in 102 a1a If a the 102 a2 When match the match the m 'Other	it is the method used by the Entity for sanctions ening?	Both Automated and Manual
102 a1a If a the 102 a2 When match the m 'Other	automated' or 'both automated and manual' selected:	
102 a2 When match the m	are internal system of vendor-sourced tools used?	Vendor-sourced tools
match the m 'Othe	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Fireosoft Contituity
	When did you last test the effectiveness (of finding true natches) and completeness (lack of missing data) of ne matching configuration of the automated tool? (If Other please explain in Question 110)	< 1 year
103 Does the including	s the Entity screen all sanctions relevant data, iding at a minimum, entity and location information, alned in cross border transactions against Sanctions	Yes
	it is the method used by the Entity?	Automated
105 Does the program	s the Entity have a data quality management gramme to ensure that complete data for all	Yes
106 Select th		
106 a Conso	sactions are subject to sanctions screening? ct the Sanctions Lists used by the Entity in its	
106 b United	sactions are subject to sanctions screening? Ict the Sanctions Lists used by the Entity in its attons screening processes: Insolidated United Nations Security Council Sanctions	Used for screening customers and beneficial owners and for filtering transactional data
106 c Office (OFSI)	sactions are subject to sanctions screening? Ict the Sanctions Lists used by the Entity in its Stions screening processes:	Used for screening customers and beneficial owners and for filtering transactional data  Used for screening customers and beneficial owners and for filtering transactional data

106   Lists restrained by other G7 member countries   Not used	106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
Other (specify)   Other (spe			Not used
Otto: Luxemburgish sanctions lists, Seighan sanctions lists, Swiss sanctions lists.  107 When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual andor automated screening setting shall be supported to the sanctions of the sanctions o			
When regulatory authorities make updates to their Sanctions list, how many business days before the entity systems applied to the control of	1001	S.1101 (Option))	
Sanctions is st, how many business days before the entity updates that active manual and/or automated screening stelems against:  107 a Customer Data Same day to 2 business days  107 b Transactions  108 business days Same day to 2 business days  No  Or Grimentor days days  No  To Grimentor days days days days days days days days			Q106 : Luxemburgish sanctions lists, Belgian sanctions lists, Swiss sanctions lists.
Sanctions is st, how many business days before the entity updates that active manual and/or automated screening stelems against:  107 a Customer Data Same day to 2 business days  107 b Transactions  108 business days Same day to 2 business days  No  Or Grimentor days days  No  To Grimentor days days days days days days days days			
Sanctions last, how many business days before the entity updates their active manual and/or automated screening setterns against:  107 a Customer Data Same day to 2 business days  No  Or days days days days days days days days	107	When regulatory authorities make updates to their	
updates their active manual and/or automated screening automated and/or automated screening and a Customer Data Same day to 2 business days   107 b Transactions  Does the Ernity have a physical presence, e.g., branches, substitutions, and standards or representative offices blocated in  publications, and Sancions?  108 Confirm that all responses provided in the above Section are representative offices school and representative offices school are representative of the above Section are representative to all the LEP branches  109 a If N. clarity which questions the difference's relate to and the branch's that this applies to.  110 If appropriate, provide any additional information/context to the answers in his section.  111 Describes the Ernity provide mandatory training, which  111 a Identification and spending of transactions to government suthorities  111 a Identification and spending of transactions to government authorities  111 b Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the place of productions whiching the remove and surface which is the provide and school and provide any surface in the provide and school and provide any surface in the provide and school and provide any surface in the provide and school and provide any surface in the provide and school and provide any surface in the provide and school and provide any surface in the provide and school and provide any surface in the provide and school and provided to the school and provided and school and provided and school and provided and school and provided to the school and provided and provided and school and provided and provided and provided and provided and provided and school and provided a			
Systems against   Same day to 2 business days			
107 b			
Same day to 2 business days	107 a		Same day to 2 business days
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 GY member countries have enacted comprehensive purisdiction-based Sanctions?  109 Confirm that all responses provided in the above Soction are representative of all the LE's branches  109 a II N, clarify with opestions the difference/s relate to and the branchies that this applies to.  110 If appropriate, provide any additional information/context to the answers in this section.  111 Des the Entity provide mandatory training, which includes  111 Des the Entity provide mandatory training, which includes  111 Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services oftened internal policies for controlling money laundering, terrorist financing and sanctions violations relevant for the types of products and services oftened internal policies for controlling money laundering, terrorist financing and sanctions violations relevant for the types of products and services oftened internal policies for controlling money laundering, terrorist financing and sanctions violations relevant for the types of products and services oftened internal policies for controlling money laundering, terrorist financing and sanctions violations relevant for the types of products and services oftened internal policies for controlling money laundering, terrorist financing and sanctions violations relevant for the types of products and services oftened internal policies for controlling money laundering, terrorist financing and sanctions violations relevant for the types of products and services oftened internal policies for controlling money laundering, terrorist for the types of products and services oftened internal policies for controlling money laundering, terrorist for the types of products and services of the products of the types of the products of the types of the products of the types of the			Same day to 2 business days
subsidiaries, or representative offices located in countries/regions against whol NU, DACA, CPSI, EU or GT member countries have enacted comprehensive jurisdiction-based Sanctions?  109		Does the Entity have a physical presence, e.g. branches,	
ocurtrier/egions against which UN, DFAC, DFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?  109 Confirm that all responses provided in the above Section are representative of all the LE's branches 109 a If N, Carlly which questions the difference/s relate to and the branch/se that this applies to.  110 If appropriate, provide any additional information/context to the answers in this section.  111 Dees the Entity provide mandatory training, which includes:  111 a Identification and reporting of transactions to government authorities.  111 b Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  111 c Internal policies for controlling money laundering, terrorist financing and sanctions violations.  111 d New issues that occur in the market, e.g. significant regulatory actions or new regulations.  111 e Conduct and Culture  112 b Secard and Servic Committee Management  112 c Secard and Servic Committee Management  112 e Secard and Servic Committee Management  112 e Third parties to which specific FCC activities have been outsourced  113 b Oees the Entity provide AML, CTF and Sanctions training that is targeted to specific PCC activities have been outsourced  114 D Oes the Entity provide customised training of annually has that is targeted to specific PCC activities have been outsourced  112 D Oes the Entity provide AML, CTF and Annually has a Pool of the Amount of the Amoun			
Of member countries have enacted comprehensive jurisdiction-based Sanctions?  109 Confirm that all responses provided in the above Section are representative of all the LES branches 109 a II N, Castry with cynesthore the difference's relate to and the branch's that this applies to.  110 If appropriate, provide any additional information/context to the answers in this section.  111 Dees the Entity provide mandatory training, which includes: 111 Dees the Entity provide mandatory training, which includes: 111 Dees the Entity provide mandatory training, which includes: 111 Examples of different forms of money laundering, terrorist internal policies for controlling money launder			No.
Confirm that all responses provided in the above Section are representative of all the LE's branches and the section are representative of all the LE's branches and the section.  If I, Clarify which questions the differenced 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/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 mandatory training, which includes:  If a dientification and reporting of transactions to government in the additional information and analysis and services of the analysis and services and authorities.  If a dientification and reporting of transactions to government in the types of products and services and architics relevant for the types of products and services and architics relevant for the types of types of types of the types of			
Confirm that all responses provided in the above Section are representative of all the LE's branches 109 a If N, Clarify which questions the difference's relate to and the branch's that this applies to.  110 If appropriate, provide any additional information/context to the answers in this section.  111 Does the Entity provide mandatory training, which includes: 111 a identification and reporting of transactions to government authorities 111 a transhing and sanctions violations relevant for the types of products and services offered internal policies for controlling money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered internal policies for controlling money laundering, terrorist financing and sanctions violations (1) the types of products and services offered internal policies for controlling money laundering, terrorist financing and sanctions violations (1) the types of products and services offered internal policies for controlling money laundering, terrorist financing and sanctions violations (1) the types of products and services offered internal policies for controlling money laundering, terrorist financing and sanctions violations (1) the types of products and services of the market, e.g. significant regulatory actions or new regulators 111 c Internal policies for controlling money laundering, terrorist financing and sanctions violations (1) the types of products and types of the types of types of types of the types of types of types of the types of		iurisdiction-based Sanctions?	
are representative of all the LFs branches  If N. clarify which questions the difference's relate to and the branch'es that this applies to.  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 a propriate, provide any additional information/context to the answers in this section.  If a provide any additional information/context to the answers in this section.  If a clarify which includes:  If a dentification and reporting of transactions to government a authorities  If a dentification and reporting of transactions to government a cuthorities  If a dentification and reporting of transactions to government a cuthorities  If a dentification and reporting of transactions to government a cuthorities  If a dentification and reporting of transactions to government a cuthorities  If a dentification and reporting of transactions to government a cuthorities  If a control in a dentification and reporting of transactions violations relevant for the types of products and services offered  If a conduct and Cutture  Yes  If a conduct and Cutture  Yes  If a Board and Senior Committee Management  Yes  If a Board and Senior Committee Management  Yes  If a Board and Senior Committee Management  Yes  If a Conduct and Celence  Yes  If a Conduct and Celence  Yes  If a Non-employed workers (contractorsconsultants)  Non-employed workers contractorsconsultants)  Non-employed workers contractorsconsultants  Non-employed workers contractorsconsultants  Non-employed workers contractorsconsultants)  Non-employed workers contractorsconsultants  Non-employed workers contractorsconsultants  Non-employed workers contractorsconsultants  Non-employed workers contractorsconsultants  Non-employed workers contractorsconsulta	100	1′	
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.  It appropriate, provide any additional information/context to the answers in this section.  It appropriate, provide any additional information/context to the answers in this section.  It appropriate, provide any additional information/context to the answers in this section.  It appropriate, provide any additional information/context to the answers in this section.  It appropriate, provide any additional information/context to the answers in this section.  It appropriate, provide any additional information/context to the answers in this section.  It appropriate, provide any additional information/context to the answers in this section.  It appropriate, provide any additional information/context to the answers in this section.  It appropriate, provide any additional information/context to the answers in this section.  It appropriate, provide any additional information/context to the answers in this section.  It appropriate, provide and sent or an and antivities and antivities and antivities and a sent or an analysis and a sent or an antivities and a sent or	108		Yes
It appropriate, provide any additional information/context to the answers in this section.	109 a	If N, clarify which questions the difference/s relate to and	
110   If appropriate, provide any additional information/context to the answers in this section.		the branch/es that this applies to.	
the answers in this section.  111 Does the Entity provide mandatory training, which includes: 111 a Identification and reporting of transactions to government authorities 111 b Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered 111 c Internal policies for controlling money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered 111 d New Issues that occur in the market, e.g. significant regulatory actions or new regulations 111 e Conduct and Culture 112 c Conduct and Culture 112 a Is the above mandatory training provided to: 112 a Seard and Senior Committee Management 112 a Is Beard and Senior Committee Management 112 a Is It is the of Defence 112 c Internal policience 112 e Third parties to which specific FCC activities have been outsourced 112 1 Non-employed workers (contractors/consultants) 113 Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?  114 a If y, how frequently is training delivered? 115 Confirm that all responses provided in the above Section 115 Confirm that all responses provided in the above Section 116 Confirm that all responses provided in the above Section 117 Vege			not applicable
the answers in his section.  111. TRAINING & EDUCATION  111 Dees the Entity provide mandatory training, which includes: 111 a Identification and reporting of transactions to government authorities 111 b Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered 111 c Internal policies for controlling money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered 111 d New issues that occur in the market, e.g. significant regulation actions or new regulations 111 e Conduct and Culture 112 e Conduct and Culture 112 a Is the above mandatory training provided to: 112 a Seard and Serior Committee Management 112 b Ist Line of Defence 112 c Ist Line of Defence 112 c Indine of Defence 112 e Third parties to which specific FCC activities have been outsourced. 112 n One-mployed workers (contractors/consultants) 113 Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?  114 a If y, how frequently is training delivered? 115 Confirm that all responses provided in the above Section 115 Confirm that all responses provided in the above Section 116 Confirm that all responses provided in the above Section 117 veges			
the answers in this section.  111 Does the Entity provide mandatory training, which includes: 111 a Identification and reporting of transactions to government authorities 111 b Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered 111 c Internal policies for controlling money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered 111 d New Issues that occur in the market, e.g. significant regulatory actions or new regulations 111 e Conduct and Culture 112 c Conduct and Culture 112 a Is the above mandatory training provided to: 112 a Seard and Senior Committee Management 112 a Is Beard and Senior Committee Management 112 a Is It is the of Defence 112 c Internal policience 112 e Third parties to which specific FCC activities have been outsourced 112 1 Non-employed workers (contractors/consultants) 113 Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?  114 a If y, how frequently is training delivered? 115 Confirm that all responses provided in the above Section 115 Confirm that all responses provided in the above Section 116 Confirm that all responses provided in the above Section 117 Vege	440	Wannesdate and ideas and additional information/portent to	
11. TRAINING & EDUCATION	110		
111 Does the Entity provide mandatory training, which includes:  111 dentification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations  111 c Internal policies for controlling money laundering, terrorist financing and sanctions violations  111 d Nev issues that occur in the market, e.g. significant regulatory actions or new regulations  111 e Conduct and Culture Yes  111 e Conduct and Services or new regulations  112 a Is the above mandatory training provided to:  112 a Is above mandatory training provided to:  112 a Board and Service Management Yes  112 b 1st Line of Defence Yes  112 c 2nd Line of Defence Yes  112 e Third parties to which specific FCC activities have been outsourced  112 f Non-employed workers (contractors/consultants)  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 delivered?  115 Confirm that all responses provided in the above Section  126 Confirm that all responses provided in the above Section  127 Confirm that all responses provided in the above Section  128 Confirm that all responses provided in the above Section		the answers in this section.	
111 Does the Entity provide mandatory training, which includes:  111 dentification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations  111 c Internal policies for controlling money laundering, terrorist financing and sanctions violations  111 d Nev issues that occur in the market, e.g. significant regulatory actions or new regulations  111 e Conduct and Culture Yes  111 e Conduct and Services or new regulations  112 a Is the above mandatory training provided to:  112 a Is above mandatory training provided to:  112 a Board and Service Management Yes  112 b 1st Line of Defence Yes  112 c 2nd Line of Defence Yes  112 e Third parties to which specific FCC activities have been outsourced  112 f Non-employed workers (contractors/consultants)  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 delivered?  115 Confirm that all responses provided in the above Section  126 Confirm that all responses provided in the above Section  127 Confirm that all responses provided in the above Section  128 Confirm that all responses provided in the above Section			
111 Does the Entity provide mandatory training, which includes:  111 a Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  111 c Internal policies for controlling money laundering, terrorist financing and sanctions violations  111 d New issues that occur in the market, e.g. significant regulatory actions or new regulations  111 e Conduct and Culture Yes  111 f Fraud Yes  111 a Beard and Senior Committee Management Yes  112 a Is the above mandatory training provided to:  112 a Board and Senior Committee Management Yes  112 a Is Line of Defence Yes  112 a Is Line of Defence Yes  112 a Is Thing parties to which specific FCC activities have been outsourced  112 a Thing parties to which specific FCC activities have been outsourced outsourced outsourced Non-employed workers (contractors/consultants)  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 delivered?  115 Confirm that all responses provided in the above Section Yes  Annually  Ves  Annually  Ves			
includes:  It identification and reporting of transactions to government authorities  It identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist franancing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  It is described in the services offered in the services of the serv	11, TRAININ	G & EDUCATION	
Items	111	Does the Entity provide mandatory training, which	
authorities  111 b Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  111 c Internal policies for controlling money laundering, terrorist financing and sanctions violations  111 d New issues that occur in the market, e.g. significant regulatory actions or new regulations  111 e Conduct and Culture  111 e Conduct and Culture  112 is the above mandatory training provided to:  112 a Board and Senior Committee Management  112 b 1st Line of Defence  112 c 2nd Line of Defence  112 d 3rd Line of Defence  112 d 3rd Line of Defence  112 e Third parties to which specific FCC activities have been outsourced  112 f Non-employed workers (contractors/consultants)  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 statif?  115 Confirm that all responses provided in the above Section yas			
Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  111 e Conduct and Culture Yes  111 f Fraud Yes  112 is the above mandatory training provided to:  112 a Board and Senior Committee Management Yes  112 b 1st Line of Defence Yes  112 c 2nd Line of Defence Yes  112 d 3rd Line of Defence Yes  112 d 3rd Line of Defence Yes  112 d 3rd Line of Defence Yes  112 f Non-employed workers (contractors/consultants)  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?  115 Confirm that all responses provided in the above Section Yes  Confirm that all responses provided in the above Section  Yes  Yes  Annually  Yes	111 a		Yes
terrorist financing and sanctions violations relevant for the types of products and services offered  111 c Internal policies for controlling money laundering, terrorist financing and sanctions violations  111 d New issues that occur in the market, e.g. significant regulatory actions or new regulations  111 e Conduct and culture Yes  111 f Fraud Yes  112 is the above mandatory training provided to: 112 a Board and Senior Committee Management Yes  112 b 1st Line of Defence Yes  112 d 3rd Line of Defence Yes  112 d 3rd Line of Defence Yes  112 d Third parties to which specific FCC activities have been outsourced  112 f Non-employed workers (contractors/consultants)  113 Does the Entity provide AML, CTF & Sanctions training that is targeted to specific rotes, responsibilities and high risk products, services and activities?  114 Does the Entity provide customised training delivered?  115 Confirm that all responses provided in the above Section Yes  116 Confirm that all responses provided in the above Section			
the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  Internal policies for controlling money laundering, terrorist financing and sanctions violations  Internal policies for controlling money laundering, terrorist financing and sanctions violations  Internal policies for controlling money laundering, terrorist financing and sanctions staff?  Internal policies for controlling money laundering, terrorist financing and services of new regulations  Yes  Internal policies for controlling money laundering, terrorist financing and services of new regulations  Yes  Internal policies for controlling money laundering, terrorist financing for AML, or for services and services and services and activities?  Yes  Internal policies for controlling money laundering, terrorist financing for AML, or for services and services for the above Section for the services and services on the services for the services and services and services and services and services for the services and servic	111 b		·
Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  111 e Conduct and Culture Yes  111 f Fraud Yes  112 ls the above mandatory training provided to:  112 a Board and Senior Committee Management Yes  112 b 1st Line of Defence Yes  112 c 2nd Line of Defence Yes  112 d 3rd Line of Defence Yes  112 e Third parties to which specific FCC activities have been outsourced  112 f Non-employed workers (contractors/consultants)  113 Does the Entity provide AML, CTF & Sanctions training that its 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?  115 Confirm that all responses provided in the above Section  115 Confirm that all responses provided in the above Section			res
financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  111 e Conduct and Culture Yes  111 f Fraud Yes  112 Is the above mandatory training provided to:  112 a Board and Senior Committee Management Yes  112 b Ist Line of Defence Yes  112 c 2nd Line of Defence Yes  112 c 3rd Line of Defence Yes  112 e Third parties to which specific FCC activities have been outsourced  112 f Non-employed workers (contractors/consultants)  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?  115 Confirm that all responses provided in the above Section Yes  116 Confirm that all responses provided in the above Section Yes	444		
111 d New issues that occur in the market, e.g. significant regulatory actions or new regulations  111 e Conduct and Culture  112 f Fraud Yes  112 is the above mandatory training provided to:  112 a Board and Senior Committee Management Yes  112 b 1st Line of Defence Yes  112 c 2nd Line of Defence Yes  112 d 3rd Line of Defence Yes  112 e Third parties to which specific FCC activities have been outsourced  112 f Non-employed workers (contractors/consultants)  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 delivered?  115 Confirm that all responses provided in the above Section  116 Confirm that all responses provided in the above Section  117 Ves  118 Confirm that all responses provided in the above Section  119 Confirm that all responses provided in the above Section	111 C		Yes
regulatory actions or new regulations  111 e Conduct and Culture Yes  112 is the above mandatory training provided to:  112 a Board and Senior Committee Management Yes  112 b 1st Line of Defence Yes  112 c 2nd Line of Defence Yes  112 d 3rd Line of Defence Yes  112 d Third parties to which specific FCC activities have been outsourced  112 f Non-employed workers (contractors/consultants)  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?  115 Confirm that all responses provided in the above Section  Yes  Annually  Yes	444.4		
111 e Conduct and Culture Yes 111 f Fraud Yes 112 Is the above mandatory training provided to: 112 a Board and Senior Committee Management Yes 112 b 1st Line of Defence Yes 112 c 2nd Line of Defence Yes 112 d 3rd Line of Defence Yes 112 e Third parties to which specific FCC activities have been outsourced 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? 115 Confirm that all responses provided in the above Section 116 Yes  Yes  Yes  Not Applicable  No Yes  Yes  Annually Yes	111 4		Yes
111 f Fraud Yes  112 Is the above mandatory training provided to:  112 a Board and Senior Committee Management Yes  112 b 1st Line of Defence Yes  112 c 2nd Line of Defence Yes  112 d 3rd Line of Defence Yes  112 e Third parties to which specific FCC activities have been outsourced  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?  115 Confirm that all responses provided in the above Section  117 Yes  118 Confirm that all responses provided in the above Section	111 e		Yes
112 a   Board and Senior Committee Management   Yes     112 b   1st Line of Defence   Yes     112 c   2nd 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)     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?     115   Confirm that all responses provided in the above Section     116   Source   Source   Source   Source			
Board and Senior Committee Management   Yes			1.44
112 b 1st Line of Defence Yes 112 c 2nd Line of Defence Yes 112 d 3rd Line of Defence Yes 112 e Third parties to which specific FCC activities have been outsourced 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?  115 Confirm that all responses provided in the above Section			Vec
112 c 2nd Line of Defence Yes  112 d 3rd Line of Defence Yes  112 e Third parties to which specific FCC activities have been outsourced  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?  115 Confirm that all responses provided in the above Section  Yes  Yes  Yes  Annually  Yes			
112 d 3rd Line of Defence Yes  112 e Third parties to which specific FCC activities have been outsourced  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?  115 Confirm that all responses provided in the above Section  Yes  Not Applicable  Not Applicable  Yes  Annually  Yes	***************************************		
Third parties to which specific FCC activities have been outsourced  Not Applicable  Yes  Third parties to which specific FCC activities have been outsourced.  Not Applicable  Yes			
outsourced  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?  115 Confirm that all responses provided in the above Section  116 No  No  Yes  Yes			
112 f Non-employed workers (contractors/consultants)  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?  115 Confirm that all responses provided in the above Section Yes	1128		Not Applicable
Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?  Does the Entity provide customised training for AML, CTF and Sanctions staff?  Yes  If Y, how frequently is training delivered?  Annually  Confirm that all responses provided in the above Section	112 f		No
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?  114 If Y, how frequently is training delivered?  115 Confirm that all responses provided in the above Section			
risk products, services and activities?  Yes  114 Does the Entity provide customised training for AML, CTF and Sanctions staff?  114 If Y, how frequently is training delivered?  115 Confirm that all responses provided in the above Section			
114 Does the Entity provide customised training for AML, CTF and Sanctions staff?  114 a If Y, how frequently is training delivered? Annually  115 Confirm that all responses provided in the above Section			Yes
and Sanctions staft?  114 a If Y, how frequently is training delivered? Annually  115   Confirm that all responses provided in the above Section		hand had been been been been been been been bee	
and Sanctions staft?  114 a If Y, how frequently is training delivered? Annually  115   Confirm that all responses provided in the above Section Ves			
and Sanctions staft?  114 a If Y, how frequently is training delivered? Annually  115 Confirm that all responses provided in the above Section Ves	114		Yes I
115 Confirm that all responses provided in the above Section	444		
			Armuary
lare representative or all the LE's branches	115		Yes
		jare representative of all the LE's branches	

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not applicable
116	If appropriate, provide any additional information/context to the answers in this section.	
COMOUNTY	ADOLIO MOETO MOETO TEOTINO	
	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)?	No ·
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	No
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not applicable
120	If appropriate, provide any additional information/context to the answers in this section.	118 Independent testing is performed by the internal Audit from the shareholders and on a regular basis by the company auditor
13. AUDIT	I	
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 practices on a regular basis?	Yes
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Component based reviews
122 b	External Third Party	Component based reviews
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes Yes
123 b	Enterprise Wide Risk Assessment	
123 c	Governance KYC/CDD/EDD and underlying methodologies	Yes Yes
123 d	Name Screening & List Management	Yes
123 e	Reporting/Metrics & Management Information	Yes
123 f	Suspicious Activity Filing	Yes
123 g 123 h	Technology	Yes
123 ii	Transaction Monitoring	Yes , .
123 [	Transaction Screening Including for sanctions	Yes
123 k	Training & Education	
123	Other (specify)	
	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and	Yes
	completeness? 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.	Not applicable
	If appropriate, provide any additional information/context to the answers in this section.	122 : some branches such as Luxembourg are audited every year. Internal audit is performing at least audit every 2 years and headquarter general inspection is also performing an audit on CACEIS Compliance at least every 3 years.
14. FRAUD		
127	Does the Entity have policies in place addressing fraud	Yes
	nsk? Does the Entity have a dedicated team responsible for	
	preventing & detecting fraud?	Yes

129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	No
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.	not applicable
132	If appropriate, provide any additional information/context to the answers in this section.	112f : providers are recquired to train thier own workers 129f : Secenarios linked to manual entries in the transacton monitoring tool enable fraud to be detected

Dec	lara	tion	Sta	tem	ent

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

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

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

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

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

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

(Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in his Wollsberg CBDDQ are complete and correct to my honest bellef, and that I am authorised to execute this declaration on behalf of the Financial Institution.

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

(Signature & Date) 2024/06/03

(Signature & Date) 2024/06/03