the Wolfsberg Group

Financial Institution Name: Location (Country) : Sparekassen Sjælland-Fyn A/S Denmark

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

No#	Question	Answer
	/ & OWNERSHIP	
1	Full Legal Name	
	. a. Logar Hamo	
		Sparekassen Sjælland-Fyn A/S
2	Append a list of foreign branches which are covered by	
_	this questionnaire	
	4220101112113	N/A
3	Full Legal (Registered) Address	
3	Tuli Legal (Negistered) Address	Isefjords Allé 5
		4300 Holbæk
		TOOUTION TO THE TOTAL THE TOTAL TO THE TOTAL THE TOTAL TO THE TOTAL TH
4	Full Primary Business Address (if different from above)	
-	Tuil Filling Busiless Address (ii different from above)	
5	Date of Entity incorporation/octablishment	
J	Date of Entity incorporation/establishment	
		23.12.1825
6	Select type of ownership and append an ownership chart if	
0	available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	
	, and and an analysis and an	Nasdaq Copenhagen
		ISIN DK0060670776
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
		None
		None
8	Does the Entity, or any of its branches, operate under an	No
_	Offshore Banking License (OBL)?	INU .
8 a	If Y, provide the name of the relevant branch/es which	
	operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide	no
10	services only through online channels? Name of primary financial regulator/supervisory authority	
10	ivaine or primary illiancial regulator/supervisory authority	
		Finanstilsynet/Danish Financial Supervisory Authority
11	Provide Legal Entity Identifier (LEI) if available	
CI.	Frovide Legal Entity Identifier (LEI) If available	
		5493002DPKDEC2,1 N 1Y86
12	Provide the full legal game of the vibine to secret ""	
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	
	direction the Linky completing the DDQ/	N/A
	10	
13	Jurisdiction of licensing authority and regulator of ultimate	
	parent	N/A
14	Select the business areas applicable to the Entity	Van
14 a	Retail Banking	Yes

14 b	Private Banking	Yes
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 u	Investment Banking	Yes
14 e		
14 f	Financial Markets Trading Securities Services/Custody	Yes
14 h	Broker/Dealer	Yes
14 i	Multilateral Development Bank	No .
14 j	Wealth Management	Yes
14 k	Other (please explain)	
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 means customers primarily resident in a different jurisdiction to the location where bank services are provided)	No
15 a	If Y, provide the top five countries where the non-resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	501-1000
16 b	Total Assets	Greater than \$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 the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	
la ppopul	070 0 05D\#050	
2. PRODUC	CTS & SERVICES Does the Entity offer the following products and services:	
19	Does the Entity offer the following products and services:	Yes
19 19 a	Does the Entity offer the following products and services: Correspondent Banking	Yes
19	Does the Entity offer the following products and services:	Yes No
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?	
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?	No
19 a 19 a 1 19 a 1 a 1 b a 1 b 1 1 9 a 1 b 1 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?	No No
19 a 19 a 1 19 a 1 a 1 b 19 a 1 c 19 a 1 d 19 a 1 e 1 e 1 e 1 e 1 e 1 e 1 e 1 e 1 e 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?	No No No
19	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?	No No No Yes
19 a 19 a 1 19 a 1 a 1 b 19 a 1 c 19 a 1 d 19 a 1 e 1 e 1 e 1 e 1 e 1 e 1 e 1 e 1 e 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	No No No Yes
19 19 a 19 a1 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d	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	No No No Yes You No
19 a 19 a 1 19 a 1 a 1 b 19 a 1 b 19 a 1 c 19 a 1 d 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 MSBs, MVTSs, or Payment Service Provider (PSPs)?	No No No Yes You No
19 a 19 a 1 19 a 1 a 10 a 10 a 10 a 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)?	No No No Yes You No No No

19 a1i	Does the Entity have processes and procedures in	
10 411		No
	/MVTSs/PSPs?	N.
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
	Low Price Securities	
19 g		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.
	CONTRACT CON	
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	
19 j	Private Banking	Domestic
19 k	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 n	Trade Finance	Yes
	110001100	No 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	마음 등 등 보통 경기 있는 사람들이 보면 하면 하면 있다. 전 보고 있는 것이 되고 있는 것이 되고 있는 것이 되고 있는 것이 되고 있다. 이 것이 있는 것이 없는 것이 없는 것이 없는 것이 없다.
	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
		NO STATE OF THE PROPERTY OF TH
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	
15 po	provide more detail here, including describing the level	
		N/A
	of due diligence.	
19 q	Other high-risk products and services identified by the	
194		
	Entity (please specify)	N/A
20	Confirm that all appearance are sided in the above Continu	
20	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches.	
20 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to	
	the answers in this section.	
3. AML. CT	F & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum	
~~	AML, CTF and Sanctions standards regarding the	
	following components:	Vec
22 a	Appointed Officer with sufficient experience/expertise	Yes
22 b	Adverse Information Screening	Yes
22 c	Beneficial Ownership	Yes
22 d	Cash Reporting	Yes
		Yes
22 e	CDD	
22 e 22 f	EDD	Yes
22 e 22 f 22 g	EDD Independent Testing	Yes Yes
22 e 22 f	EDD Independent Testing Periodic Review	Yes Yes Yes
22 e 22 f 22 g	EDD Independent Testing	Yes Yes
22 e 22 f 22 g 22 h 22 i	EDD Independent Testing Periodic Review	Yes Yes Yes
22 e 22 f 22 g 22 h 22 i 22 j	EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Yes Yes Yes Yes Yes Yes
22 e 22 f 22 g 22 h 22 i 22 j 22 k	EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment	Yes Yes Yes Yes Yes Yes Yes
22 e 22 f 22 g 22 h 22 i 22 j	EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Yes Yes Yes Yes Yes Yes

22 m	Ta	lv.
	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML,	11-100
	CTF & Sanctions Compliance Department?	
24	Is the Entity's AML, CTF & Sanctions policy approved at	
	least annually by the Board or equivalent Senior	Yes
	Management Committee? If N, describe your practice in	
05	Question 29.	
25	Does the Board receive, assess, and challenge regular	V
	reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any	
20	components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details,	
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section	V
No.	are representative of all the LE's branches	Yes
28 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	
20	If appropriate provide any additional information/text to	
29	If appropriate, provide any additional information/context to the answers in this section.	
	ure answers in this section.	
4. ANTI B	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and	Yes
	requirements to reasonably prevent, detect and report	Yes
	bribery and corruption?	
31	Does the Entity have an enterprise wide programme that	Yes
	sets minimum ABC standards?	103
32	Has the Entity appointed a designated officer or officers	
	with sufficient experience/expertise responsible for	Yes
	coordinating the ABC programme?	
33	Does the Entity have adequate staff with appropriate levels	
	of experience/expertise to implement the ABC	Yes
24	programme?	Not Applicable
34 35	Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that:	Not Applicable
35 a	Prohibits the giving and receiving of bribes? This	
35 a	includes promising, offering, giving, solicitation or	
	receiving of anything of value, directly or indirectly, if	Yes
	improperly intended to influence action or obtain an	103
	advantage	
35 b	Includes enhanced requirements regarding interaction	
00 5		Yes
	with public officials?	
35 c	with public officials? Includes a prohibition against the falsification of books	
35 с	with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any	
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any	Yes
35 с	Includes a prohibition against the falsification of books	Yes
	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
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? Does the Entity have controls in place to monitor the	Yes
36	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?	
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36 37	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?	Yes
36	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
36 37	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
36 37 38	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
36 37	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	Yes Yes
36 37 38	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
36 37 38	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	Yes Yes
36 37 38	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	Yes Yes
36 37 38	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	Yes Yes
36 37 38 38 a	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
36 37 38 38 a	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
36 37 38 38 a	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
36 37 38 38 a	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:	Yes Yes Yes No
36 37 38 38 a	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:	Yes Yes Yes No
36 37 38 38 a 39 40 40 a	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 No
36 37 38 38 a 39	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 No
36 37 38 38 a 39 40 40 a	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	Yes Yes Yes No
36 37 38 38 a 39 40 40 a 40 b	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 No
36 37 38 38 a 39 40 40 a	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 No Yes
36 37 38 38 a 39 40 40 a 40 b	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
36 37 38 38 a 39 40 40 a 40 b	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 No Yes
36 37 38 38 a 39 40 40 a 40 b	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 No Yes Yes
36 37 38 38 a 39 40 40 a 40 b	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 No Yes

40 e	Changes in business activities that may materially	V
	increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
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 subject to ABC risk have been outsourced	Not Applicable
42 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	No
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
5. AML, C	CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect	
46 a	and report: Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	No
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	Yes
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 с	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
49 h	Assess the risks of relationships with domestic and	

49 i		
49 j	Define the process for escalating financial crime risk	l.,
49 j	issues/potentially suspicious activity identified by	Yes
49 j	employees	
43]	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	
43 K		
	reasons that applies across the entity, including foreign	Yes
	branches and affiliates	
49 1	Define the process and controls to identify and handle	
451		
	customers that were previously exited for financial crime	Yes
	reasons if they seek to re-establish a relationship	
	A SECOND CONTROL OF CO	
49 m	Outline the processes regarding screening for sanctions,	
49 111		Yes
	PEPs and Adverse Media/Negative News	100
49 n	Outline the processes for the maintenance of internal	
45 11		lno
	'watchlists'	
50	Has the Entity defined a risk tolerance statement or similar	
	document which defines a risk boundary around their	Yes
		1.55
	business?	
51	Does the Entity have record retention procedures that	Yes
	comply with applicable laws?	, 55
51 a	If Y, what is the retention period?	
-14	,	
		E voors or more
		5 years or more
52	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	Yes
-		
52 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	
	10 21 110 110 117	
	If appropriate, provide any additional information/context to	
53		
53	the answers in this section.	
53	the answers in this section.	
53	the answers in this section.	
53	the answers in this section.	
	the answers in this section. F & SANCTIONS RISK ASSESSMENT	
6. AML, CTI	F & SANCTIONS RISK ASSESSMENT	
	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent	
6. AML, CTI 54	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
6. AML, CTI 54	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes
6. AML, CTI 54	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes Yes
6. AML, CTI 54 54 a 54 b	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Yes
6. AML, CTI 54 54 a 54 b 54 c	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Yes
6. AML, CTI 54 54 a 54 b	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Yes
6. AML, CTI 54 54 a 54 b 54 c 54 d	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes Yes
6. AML, CTI 54 54 a 54 b 54 c	F & SANCTIONS RISK ASSESSMENT 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
6. AML, CTI 54 54 a 54 b 54 c 54 d 55	F & SANCTIONS RISK ASSESSMENT 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
6. AML, CTI 54 54 a 54 b 54 c 54 d 55 55 a	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes Yes
6. AML, CTI 54 54 a 54 b 54 c 54 d 55	F & SANCTIONS RISK ASSESSMENT 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
6. AML, CTI 54 54 a 54 b 54 c 54 c 55 d 55 a 55 b	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Yes Yes Yes Yes Yes
6. AML, CTI 54 54 a 54 b 54 c 55 d 55 b 55 c	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes Yes Yes Yes Yes Yes Yes Yes
6. AML, CTI 54 54 a 54 b 54 c 54 d 55 b 55 a 55 b 55 c 55 d	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	Yes Yes Yes Yes Yes Yes
6. AML, CTI 54 54 a 54 b 54 c 55 d 55 b 55 c	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes
6. AML, CTI 54 54 a 54 b 54 c 54 d 55 b 55 a 55 b 55 c 55 d	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	Yes Yes Yes Yes Yes Yes Yes Yes
6. AML, CTI 54 54 a 54 b 54 c 55 d 55 c 55 d 55 c	F & SANCTIONS RISK ASSESSMENT 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
6. AML, CTI 54 54 a 54 b 54 c 55 d 55 c 55 a 55 c 55 d 55 c	F & SANCTIONS RISK ASSESSMENT 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
6. AML, CTI 54 54 a 54 b 54 c 55 d 55 c 55 d 55 c	F & SANCTIONS RISK ASSESSMENT 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
6. AML, CTI 54 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes
6. AML, CTI 54 54 a 54 b 55 4 c 55 d 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h	F & SANCTIONS RISK ASSESSMENT 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
6. AML, CTI 54 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e	F & SANCTIONS RISK ASSESSMENT 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
6. AML, CTI 54 54 a 54 b 54 c 55 d 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h 56	F & SANCTIONS RISK ASSESSMENT 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
6. AML, CTI 54 54 a 54 b 54 c 55 d 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h 56	F & SANCTIONS RISK ASSESSMENT 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
6. AML, CTI 54 54 a 54 b 55 4 c 55 d 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h	F & SANCTIONS RISK ASSESSMENT 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	Yes
6. AML, CTI 54 54 a 54 b 54 c 55 d 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h 56	F & SANCTIONS RISK ASSESSMENT 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
6. AML, CTI 54 54 a 54 b 54 c 55 d 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h 56	F & SANCTIONS RISK ASSESSMENT 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	Yes
6. AML, CTI 54 54 a 54 b 54 c 55 d 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h 56	F & SANCTIONS RISK ASSESSMENT 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	Yes
6. AML, CTI 54 54 a 54 b 54 c 55 d 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 h 56 a	F & SANCTIONS RISK ASSESSMENT 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
6. AML, CTI 54 54 a 54 b 54 c 55 d 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h 56	F & SANCTIONS RISK ASSESSMENT 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	Yes
6. AML, CTI 54 54 a 54 b 54 c 55 d 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 h 56 a	F & SANCTIONS RISK ASSESSMENT 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
6. AML, CTI 54 54 a 54 b 55 d c 55 d 55 c 55 c 55 d 55 b 55 c 55 d 55 d 55 f 55 e	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
6. AML, CTI 54 54 a 54 b 54 c 54 c 55 c 55 c 55 d 55 c 55 f 55 f 55 f 55 f 56 a	F & SANCTIONS RISK ASSESSMENT 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
6. AML, CTI 54 54 a 54 b 54 c 55 c 55 d 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 h 56 a	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes
6. AML, CTI 54 54 a 54 b 54 c 55 c 55 d 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 h 56 a	F & SANCTIONS RISK ASSESSMENT 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
6. AML, CTI 54 54 a 554 b 554 c 554 d 55 b 55 c 555 d 55 e 55 f 55 g 55 h 56 57 a 57 a 57 a 57 c	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
6. AML, CTI 54 54 a 54 b 55 c 55 a 55 b 55 c 55 d 55 d 55 d 55 d 55 d 55 f 56 a	F & SANCTIONS RISK ASSESSMENT 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
6. AML, CTI 54 54 a 554 b 554 c 554 d 55 b 55 c 555 d 55 e 55 f 55 g 55 h 56 57 a 57 a 57 a 57 c	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	Yes
6. AML, CTI 54 54 a 54 b 55 c 55 a 55 b 55 c 55 d 55 d 55 d 55 d 55 d 55 f 56 a	F & SANCTIONS RISK ASSESSMENT 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
6. AML, CTI 54 54 a 54 b 54 c 55 c 55 d 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 a 57 c 57 d 58	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
6. AML, CTI 54 54 a 54 b 55 4 c 54 d 55 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 57 a 57 a 57 c 57 d 58	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes Yes Yes Yes Yes Yes Yes Yes Yes No Yes
6. AML, CTI 54 54 a 54 b 55 c 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 f 56 a 57 c 57 a 57 a 57 b 57 c 57 d 58 a 58 b	F & SANCTIONS RISK ASSESSMENT 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
6. AML, CTI 54 54 a 54 b 55 4 c 54 d 55 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 57 a 57 a 57 c 57 d 58	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes Yes Yes Yes Yes Yes Yes Yes Yes No Yes

		N.
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	Yes
	are representative of all the LE's branches	
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context to the answers in this section.	
7 KYC CI	DD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when CDD	
	must be completed, e.g. at the time of onboarding or within 30 days?	Yes
64	Which of the following does the Entity gather and retain	
64.0	when conducting CDD? Select all that apply:	Yes
64 a	Customer identification	NAME OF THE PARTY
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers	25%
67 a	receiving a risk classification? If Y, what factors/criteria are used to determine the	Yes
550780 94633	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	No
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	
68 a3	Trigger event	
68 a4	Other	
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	No
69 a	If Y, is this at:	
69 a1	Onboarding	
69 a2	KYC renewal	

89 a3 Tigger cont What is the marked outside by the Eribly to screen for What is the marked outside by the Eribly to screen for Customers and connected agreents to determine whether they are EER's, crosbolled by PEPs? 71 a1 V is this sis 71 a2 KY is this sis 71 a2 KY is the sis 71 a2 KY to find the think to				
Activerse Media/Register News? 1 Does the Erity have a rich based appreach to screening outstomers and cornected parties to determine whether they are PEPs, no cronivold by PEPs? 71 at Orbination Yes Terry News (Yes Tast Yes T				
customers and cornected parties to determine whither they are PEPs, or cornected by PEPs? 71 a	/hat is the m	W	hat is the method used by the Entity to screen for	
customers and cornected parties to determine whither they are PEPs, or cornected by PEPs? 71 a	dverse Medi	Ad	lverse Media/Negative News?	
customers and connected parties to determine whether they are PEPs, or control by PEPs? 71 at 1 Vis this at 1 71 at 2 KyC retrieval Yes 71 at 3 Trigger event Yes 72 What is the method used by the Entity to screen PEPs? 73 Does the Entity have policies, procedures and processes to review and seculate potential materials or accessing customers and connected parties as Education and a connected parties as Education and accessing customers and connected parties as Education whether they are PEPs, or condected in activate from a careening customers and connected parties as Education whether they are PEPs, or condected in activate from a careening customers and connected parties as Education whether they are PEPs, or condected in activation whether they are PEPs, or condected in activation whether they are PEPs, or condected in activation whether they are PEPs, or condected in pEPs and they are PEPs, or condected in pEPs and they are personal activation of the PEPs, and they are				
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71 a3 Trigger event What is the mathod used by the Entity to screen PEP-7 Combination of automated and manual 72 What is the mathod used by the Entity to screen PEP-7 Combination of automated and manual 73 Does the Entity have policies, procedures and processes to review and secalate potential matches in screening customers and corrected parties to determine whether they are PEPs, or controlled by PEPs PP 74 SENT Comment of Comment of Comment of PEPs PP 74 SENT Comment of Comment of Comment of PEPs PP 74 at Less than one year 74 at Trigger-based or perpetual mandering reviews 75 Oces the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews? 76 From the list below, which sategories of customers or introductives are subject to EDD and/or are exertised, or particularly and the list below, which sategories of customers or introductives are subject to EDD and/or are exertised, or particularly and the list below, which sategories of customers or introductives are subject to EDD and/or are exertised, or particularly and the list below, which sategories of customers or introductives are subject to EDD and/or are exertised, or particularly and the list below which sategories of customers or introductives are subject to EDD and/or are exertised, or particularly and the list below which sategories of customers or introductives are subject to EDD and/or are exertised, or particularly and the list below which sategories of customers or introductives are subject to EDD and/or are exertised, or particularly and the list below which sategories of customers or introductives are exertised, or particularly and the list below which sategories	If Y, is this a	H	f Y, is this at:	
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76 h MSB/MVTS customers Prohibited	Marijuana-re		Marijuana-related Entities	Prohibited
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76 n PEPs	Payment Se	F	Payment Service Providers	Prohibited
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AML. If a customer is approved, part of the approval process includes an assessment of risk mitigati				Certain countries and business/customer types can only be onboarded after receiving approval from the Head of
have a managed in a ship at all have at the abbit at all the analysis at the a		i		AML. If a customer is approved, part of the approval process includes an assessment of risk mitigation measures.
78 Does EDD require senior business management and/or Yes	oes EDD red	Do	oes EDD require senior business management and/or	Vos
compliance approval?				100

	1	
78 a	If Y indicate who provides the approval:	Compliance
79	Does the Entity have specific procedures for onboarding	
	entities that handle client money such as lawyers,	Yes
	accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or quality	Yes
	review on clients subject to EDD?	Tes
81	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	165
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.	
8 MONIT	ORING & REPORTING	
83	Does the Entity have risk based policies, procedures and	
03	monitoring processes for the identification and reporting of	Yes
	suspicious activity?	
84	What is the method used by the Entity to monitor	
J-1	transactions for suspicious activities?	Automated
84 a	If manual or combination selected, specify what type of	
J- u	transactions are monitored manually	
	transactions are monitored managing	
84 b	If automated or combination selected, are internal	Both
	system or vendor-sourced tools used?	Don't
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the	
	name of the vendor/tool?	
		SAS AML and Eastbets SafeWatch Filtering.
84 b2	When was the tool last updated?	< 1 year
	And addressed the process of the control of the con	< i year
84 b3	When was the automated Transaction Monitoring	< 1 year
0.5	application last calibrated? Does the Entity have regulatory requirements to report	
85		Yes
85 a	suspicious transactions? If Y, does the Entity have policies, procedures and	
05 a	processes to comply with suspicious transaction	Yes
	reporting requirements?	
86	Does the Entity have policies, procedures and processes	
00		Yes
	of customer transactions and activity?	
07		
87	Does the Entity have a data quality management	Yes
	programme to ensure that complete data for all	103
00	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?	
89	Does the Entity have processes in place to send Requests	
30	for Information (RFIs) to their customers in a timely	Yes
	manner?	
90	Confirm that all responses provided in the above Section	V.
	are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to and	
00 4	the branch/es that this applies to	
	and the same of th	
91	If appropriate, provide any additional information/context to	
	the answers in this section.	
O DAVE	ENT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment	Yes
	Transparency Standards?	

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure	
93 a	compliance with: FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
		Tes
93 b1	If Y, specify the regulation	AMLD VI
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section	Yes
96 a	are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC	TIONS	
98		
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at for	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Both Automated and Manual
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Eastnets - SafeWatchFiltering
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Combination of automated and manual
105	Does the Entity have a data quality management programme to ensure that complete data for all	Yes
106	transactions are subject to sanctions screening? Select the Sanctions Lists used by the Entity in its	
106 a	sanctions screening processes: Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Office of Financial Sanctions Implementation HMT	Not used
	(OFSI)	inot used

106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/fregions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	
11. TRAINI	NG & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 с	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to :	
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	outsourced	Not Applicable
112 f		Not Applicable
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above Section	

115 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to	
	the answers in this section.	
12. QUALIT	Y ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality	
117	Assurance programme for financial crime (separate from	Yes
	the independent Audit function)?	1.55
118	Does the Entity have a program wide risk based	
110		Yes
	Compliance Testing process (separate from the	Tes
440	independent Audit function)?	
119	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	
119 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to	
120		
	the answers in this section.	
42 AUDIT		
13. AUDIT		
121	In addition to inspections by the government	
	supervisors/regulators, does the Entity have an internal	
	audit function, a testing function or other independent third	Yes
	party, or both, that assesses FCC AML, CTF, ABC, Fraud	
	and Sanctions policies and practices on a regular basis?	
122	How often is the Entity audited on its AML, CTF, ABC,	
	Fraud and Sanctions programme by the following:	
		Vest
122 a	Internal Audit Department	Yearly Composed based reviews
122 b	External Third Party	Yearly Component based reviews
	External Third Party Does the internal audit function or other independent third	
122 b 123	External Third Party Does the internal audit function or other independent third party cover the following areas:	
122 b	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and	Component based reviews
122 b 123 123 a	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures	Component based reviews Yes
122 b 123 123 a 123 b	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment	Component based reviews Yes Yes
122 b 123 123 a	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance	Component based reviews Yes
122 b 123 123 a 123 b	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment	Component based reviews Yes Yes
122 b 123 123 a 123 b 123 c 123 d	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies	Yes Yes Yes
122 b 123 123 a 123 b 123 c 123 d 123 e	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 a 123 a 123 b 123 c 123 d 123 e 123 f	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 a 123 a 123 c 123 c 123 d 123 e 123 f 123 g	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 a 123 a 123 c 123 c 123 d 123 e 123 f 123 g 123 h	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 a 123 a 123 c 123 c 123 d 123 e 123 f 123 g 123 h 123 i	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filling Technology Transaction Monitoring Transaction Screening including for sanctions	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 123 a 123 a 123 c 123 d 123 e 123 f 123 g 123 h 122 i 123 j 123 k	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filling Technology Transaction Monitoring Transaction Screening including for sanctions	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 123 a 123 a 123 c 123 d 123 e 123 f 123 g 123 h 122 i 123 j 123 k	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 123 a 123 a 123 c 123 d 123 e 123 f 123 g 123 h 122 i 123 j 123 k	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 123 a 123 a 123 c 123 d 123 e 123 f 123 g 123 h 122 i 123 j 123 k	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 123 a 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 i 123 j 123 j 123 k	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify)	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 123 a 123 a 123 c 123 d 123 e 123 f 123 g 123 h 122 i 123 j 123 k	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filling Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked	Yes
122 b 123 123 a 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 i 123 i 123 j 123 k 123 I	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 i 123 j 123 j 123 l	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filling Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
122 b 123 123 a 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 i 123 j 123 j 123 k	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filling Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completeness? Confirm that all responses provided in the above section	Yes
122 b 123 a 123 a 123 b 123 c 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 i 123 i 123 j 123 k 123 1	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 i 123 j 123 j 123 l	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 a 123 a 123 b 123 c 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 i 123 i 123 j 123 k 123 1	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 a 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 i 123 i 123 j 123 k 123 1	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 a 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 i 123 i 123 j 123 k 123 1	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 a 123 a 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k 123 i 123 b 125 a	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 a 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 i 123 i 123 j 123 k 123 1	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 a 123 a 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k 123 i 123 b 125 a	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 a 123 a 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k 123 i 123 b 125 a	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 i 123 i 123 j 123 k 125 a	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 123 a 123 a 123 b 123 c 123 d 123 f 123 f 123 j 123 j 123 j 123 k 123 l	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 a 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k 123 j 125 a 126	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 a 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k 123 i 125 a	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 a 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 j 123 j 123 b 125 a 126	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 a 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 j 123 k 123 l	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Component based reviews Yes Yes Yes Yes Yes Yes Yes
122 b 123 123 a 123 b 123 c 123 d 123 e 123 f 123 s 123 i 123 i 123 i 123 i 123 j 123 k 125 a 126	External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Component based reviews Yes Yes Yes Yes Yes Yes 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?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	
Declaration Statement Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4) Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)		
_Sparekassen Sjælland-Fyn A/S (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.		

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

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

Thomas Remenkamp3-2025_ (Signature & Date)

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