Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ) V1.4

the Wolfsberg Group

Financial Institution Name: Location (Country) : DenizBank AG Austria

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
1. ENTITY	Y & OWNERSHIP	
1	Full Legal Name	Designation AC
		DenizBank AG
	20	
2	Append a list of foreign branches which are covered	See our website: www.denizbank.at
	by this questionnaire	See our website, www.derlizbarik.at
3	Full Legal (Registered) Address	4020 Vicene Therese Vicetii Diele 4 Avetie
	1000 VA 1,000 VOT	1030 Vienna, Thomas-Klestii-Platz 1, Austria
4	Full Primary Business Address (if different from	
	above)	
5	Date of Entity incorporation/establishment	10th Echrica 1006
		10th February, 1996
6	Select type of ownership and append an ownership	
	chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate	Disease should be Devis Book AC Toulous
	beneficial owners with a holding of 10% or more	Direct shareholder: DenizBank AŞ, Turkey
		Indirect shareholder: Emirates NBD Bank PJSC, Dubai (owned by the Government of Dubai, UAE)
		Government of Dubai, OAE)
7	% of the Entity's total shares composed of bearer	
	shares	n/a
8	Does the Entity, or any of its branches, operate under	W.
	an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es	
	which operate under an OBL	
		a a
9	Does the Bank have a Virtual Bank License or	Ma
	provide services only through online channels?	No
10	Name of primary financial regulator/supervisory	Austrian Financial Market Authority, Austrian National Bank
	authority	
11	Provide Legal Entity Identifier (LEI) if available	529900ZVK4VTIS0TOT43
12	Provide the full legal name of the ultimate parent (if	Government of Dubai (UAE)
	different from the Entity completing the DDQ)	Covernment of Dubai (UAL)

	Jurisdiction of licensing authority and regulator of	Jurisdiction of licensing authority is the Central Bank of the United Arch Emirator
	ultimate parent	Jurisdiction of licensing authority is the Central Bank of the United Arab Emirates Ultimate parent company is the State of United Arab Emirates
		Ominate parent company is the state of Officer Arab Efficaces
14	Select the business areas applicable to the Entity	processing the majority of the particular and the state of the particular and the state of the particular and the particular an
14 a	Retail Banking	Yes
14 b	Private Banking	No
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	No
14 f	Financial Markets Trading	Yes
		820320
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	
	Carlot (product explaint)	
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	No
	resident in a different jurisdiction to the location	
	where bank services are provided)	
	Comment of the Commen	
15 a	If Y, provide the top five countries where the non-	
	resident customers are located.	
	The second secon	
16	Select the closest value:	
16 a	Number of employees	201-500
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above	Creater than \$600 million
17	Section are representative of all the LE's branches.	Yes
	.,	14 7-15
17 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
10		
18	If appropriate, provide any additional	
	information/context to the answers in this section.	
2 DDAD	ICTS & SEDVICES	
	UCTS & SERVICES	
	Does the Entity offer the following products and	
19	Does the Entity offer the following products and services:	
19	Does the Entity offer the following products and	Yes
19	Does the Entity offer the following products and services:	Yes
19 19 a 19 a1	Does the Entity offer the following products and services: Correspondent Banking If Y	Yes
19 19 a	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking	Yes
19 a 19 a 19 a1 19 a1a	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks?	
19 19 a 19 a1	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	No 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	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	No 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?	No 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? Does the Entity have processes and procedures	No No
19 a 19 a 19 a1 19 a1a 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 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? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking	No No
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c	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 19 a1 19 a1a 19 a1a 19 a1b	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking	No No Yes
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c	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 19 a1 19 a1a 19 a1b 19 a1c 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?	No No Yes
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks?	No No Yes No
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 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	No No Yes
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19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 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	No No Yes No
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 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?	No No No No No No No No
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 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 Yes No
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1f 19 a1f	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)?	No No No No No No No No
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1f 19 a1f	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	No No No No No No No No
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1f 19 a1f	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	No No No No No No No No
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1f 19 a1f	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	No No No No No No No No
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Coss Border Roll Coash Delivery No		in place to identify downstream relationships with	No
		MSBs /MVTSs/PSPs?	
	10 h	Cross-Border Bulk Cash Delivery	No
19 d Domestic Butic Sash Cellivery No 19 d Hold Mail No 19 d Hold Mail No 19 f International Cash Letter No 19 d Low Price Securities No 19 h Paywole Through Accounts Paywole Through Accounts 19 h Paywole Through Accounts Paywole Throu	Antonia Si		
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International Cash Letter No Paysible Through Accounts Paysible Through Paysible Th			
19 Low Price Securities No			No
Payable Through Accounts No	19 f	International Cash Letter	No
Payable Through Accounts No	19 g	Low Price Securities	No
Payment services to non-bank emilises who may the offer hird party payment services for hird p	19 h	Payable Through Accounts	
then offer hird party payment services to their customers? 1911			
Pisses select	151	then offer third party payment services to their	No
Piese select	19 i1	If Y, please select all that apply below?	The state of the s
1913 Virtual Asset Sanktoe Providers (VASPs) Please select	19 i2		Please select
Please select			10. AND 10. AN
19 Private Banking Both No 19 Remote Deposit Capture (RDC) No 19 Remote Deposit Capture (RDC) No 19 Spread Value instruments No 19 Trade Finance Yes 19 Order Carbin of the following please state whether you offer the service to walk-in customers and if so, the applicable level of dwell diligence 19 Por each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of dwell diligence 19 Por each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of dwell diligence 19 Por each of the following please state whether you offer the service with the properties of the pr	NAVGOST-BALLS		
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1914 Sprosoring Private ATMS Yes	1915	Ошет - гтеазе ехртапт	
Sponsoring Private ATMs	19 j	Private Banking	Both
Sponsoring Private ATMs	19 k		
19 m Trade Finance Yes	19 I		DOMO.
19 n Trade Finance Yes No			
19 p For each of the following please state whether you offer the service to walk in customers and if so, the applicable level of due diligence: 19 p1		100000 (2) A 10000 (2) A 2000 (2)	
For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence. Please select.		a district to a district const	AND THE RESERVE TO THE PROPERTY OF THE PROPERT
offer the service to walk-in customers and if so, the applicable level of due diligence: 19 p1	19 o	Virtual Assets	No
19 pt Check cashing service No Pipelase select	19 р	offer the service to walk-in customers and if so, the	
19 pt a If yas, state the applicable level of due diligence Please select 19 p2	10 m1		At an in the second of the sec
19 pZ Wire transfers Yes 19 pZa If yes, state the applicable level of due diligence Pys Due diligence Due diligence Pys Due diligence Du			
19 p2a If yes, state the applicable level of due diligence Yes 19 p3			11. S MONOCONTO CONTO CO
19 p3 Foreign currency conversion Yes			
19 p3			Due diligence
Sale of Monetary Instruments No	19 p3	Foreign currency conversion	Yes
If yes, state the applicable level of due diligence Please select Walk-in customers please provide more detail here, including describing the level of due diligence. Walk-in customers can only have currency exchange, wire transfers to Turkey (limited amount) and send/receive MoneyGram payments.	19 p3a	If yes, state the applicable level of due diligence	Due diligence
If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. 19 q Other high-risk products and services identified by the Entity (please specify) 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 21 If Appropriate, provide any additional information/context to the answers in this section. 22 If appropriate, provide any additional information/context to the answers in this section. 23 AML, CTF & SANCTIONS PROGRAMME 24 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 25 Appointed Officer with sufficient 26 Appointed Officer with sufficient 27 Yes 28 Appointed Officer with sufficient 29 Adverse Information Screening 20 Cash Reporting 21 Yes 22 Cash Reporting 22 Cash Reporting 23 Cash Reporting 24 Periodic Review 25 Periodic Review 26 Periodic Review 27 Yes 28 Periodic Review 29 Periodic Review 29 Periodic Review 20 Periodic Review 20 Periodic Review 20 Periodic Review 20 Periodic Risk Assessment 20 Pickes Assessment 20 Pother size of the first payments and only have currency exchange, wire transfers to Turkey (limited amount) and send/receive MoneyGram payments. 20 Walk-in customers and only have currency exchange, wire transfers to Turkey (limited amount) and send/receive MoneyGram payments. 20 Walk-in customers and only have currency exchange, wire transfers to Turkey (limited amount) and send/receive MoneyGram payments. 21 Periodic Review Periodic Review 22 Periodic Review 23 Periodic Review 24 Risk Assessment 25 Periodic Review 26 Risk Assessment 26 Periodic Review 27 Periodic Review 28 Periodic Review 29 Periodic	19 p4	Sale of Monetary Instruments	No
please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. AML, CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Pes Appointed Officer with sufficient Yes Beneficial Ownership Yes CDB Yes CDB Yes CDB Yes Periodic Review Yes Periodic Review Yes Periodic Review Yes Per Screening Yes Risk Assessment Yes Risk Assessment Yes Risk Assessment Yes Risk Assessment	19 p4a	If yes, state the applicable level of due diligence	Please select
the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. AML, CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Adverse Information Screening Yes Adverse Information Screening Yes Cab Reporting Yes CDD Yes LDD	19 p5	please provide more detail here, including	
Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. 3. AML, CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22	19 q		None
and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. 3. AML, CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 a Appointed Officer with sufficient Yes 22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes 22 d Cash Reporting Yes 22 e CDD Yes 22 f EDD Yes 22 g Independent Testing Yes 22 l Periodic Review Yes 22 l Periodic Review Yes 22 l Policies and Procedures Yes 22 l PEP Screening Yes 22 g PEP Screening Yes 22 k Risk Assessment Yes	20		Yes
and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. 3. AML, CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 a Appointed Officer with sufficient Yes 22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes 22 d Cash Reporting Yes 22 e CDD Yes 22 f EDD Yes 22 g Independent Testing Yes 22 l Periodic Review Yes 22 l Periodic Review Yes 22 l Policies and Procedures Yes 22 l PEP Screening Yes 22 g PEP Screening Yes 22 k Risk Assessment Yes	20 a		
information/context to the answers in this section. 19a: Third party payments / payable through is not allowed 19a1g: MoneyGram 3. AML, CTF & SANCTIONS PROGRAMME 22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 a Appointed Officer with sufficient Yes 22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes 22 d Cash Reporting Yes 22 e CDD Yes 22 e CDD Yes 22 f EDD Yes 22 g Independent Testing Yes 22 l Periodic Review Yes 22 l Periodic Review Yes 22 l Policies and Procedures Yes 22 j PEP Screening Yes 22 k Risk Assessment Yes	20 a		
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Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Yes Cac Beneficial Ownership Yes Cac Cash Reporting Yes Cac CDD Yes Cac C	2 AREL C	TE & CANCTIONS DECORANTE	
AML, CTF and Sanctions standards regarding the following components: 22 a Appointed Officer with sufficient Yes 22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes 22 d Cash Reporting Yes 22 e CDD Yes 22 e CDD Yes 22 e FDD Yes 22 g Independent Testing Yes 22 g Independent Review Yes 22 h Periodic Review Yes 22 i Policies and Procedures Yes 22 j PEP Screening Yes 22 j PEP Screening Yes 22 k Risk Assessment Yes			
22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes 22 d Cash Reporting Yes 22 e CDD Yes 22 f EDD Yes 22 g Independent Testing Yes 22 h Periodic Review Yes 22 l Policies and Procedures Yes 22 j PEP Screening Yes 22 k Risk Assessment Yes	22	AML, CTF and Sanctions standards regarding the	
22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes 22 d Cash Reporting Yes 22 e CDD Yes 22 f EDD Yes 22 g Independent Testing Yes 22 h Periodic Review Yes 22 l Policies and Procedures Yes 22 j PEP Screening Yes 22 k Risk Assessment Yes	22 a	Appointed Officer with sufficient	Yes
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22 e CDD Yes 22 f EDD Yes 22 g Independent Testing Yes 22 h Periodic Review Yes 22 i Policies and Procedures Yes 22 j PEP Screening Yes 22 k Risk Assessment Yes		·	12(0) 20
22 f EDD Yes 22 g Independent Testing Yes 22 h Periodic Review Yes 22 i Policies and Procedures Yes 22 j PEP Screening Yes 22 k Risk Assessment Yes	The Control of the Co		
22 g Independent Testing Yes 22 h Periodic Review Yes 22 i Policies and Procedures Yes 22 j PEP Screening Yes 22 k Risk Assessment Yes	S-1,000 S-1	Oles Application	100000
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22 I Policies and Procedures Yes 22 j PEP Screening Yes 22 k Risk Assessment Yes	22 g	Independent Testing	Yes
22 I Policies and Procedures Yes 22 j PEP Screening Yes 22 k Risk Assessment Yes	22 h	Periodic Review	Yes
22 j PEP Screening Yes 22 k Risk Assessment Yes	22 i	Policies and Procedures	
22 k Risk Assessment Yes		A SHORT OF THE STATE OF THE STA	WAS TO SELECT THE SELE
A STANDARD CONTRACTOR		9	
Zeri Janutions Yes		I Risk Assessment	

22 m	Suspicious Activity Reporting	Yes
22 m	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	1-10
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Yes
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	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 are representative of all the LE's branches	Yes
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	
4. ANTI	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
40 с	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
40 e	Changes in business activities that may materially 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	Yes
42 f	Non-employed workers as appropriate (contractors/consultants)	Yes
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
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	TF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least annually?	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?	Not Applicable
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 c	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 foreign PEPs, including their family and close associates	Yes

49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
49 I	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	5 years or more
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context to the answers in this section.	48a: US laws are not in force in Austria, where DenizBank AG operates. DenizBank strictly adheres to US sanctions, but does not adhere to all US standards
C ALL OTE	S CANOTIONS BIOK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the	
F4 -	inherent risk components detailed below:	The state of the s
54 a 54 b	Client Product	Yes Yes
54 c	Channel	Yes
54 d	Geography	Yes
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
55 a	Transaction Monitoring	Yes
55 b	Customer Due Diligence	Yes
55 c	PEP Identification	Yes
55 d 55 e	Transaction Screening Name Screening against Adverse Media/Negative	Yes Yes
	News	165
55 f	Training and Education	Yes
55 g 55 h	Governance Management Information	Yes
56	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
56 a	If N, provide the date when the last AML & CTF EWRA was completed.	
57	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
57 a	Client	Yes
57 b	Product	Yes
57 с	Channel	Yes
57 d	Geography	Yes
	Does the Entity's Sanctions EWRA cover the controls	the sale of the first and the first than the sale of t
58	effectiveness components detailed below:	A Section of the Company of the Comp
58 a	Customer Due Diligence	Yes
58 a 58 b	Customer Due Diligence Governance	Yes
58 a	Customer Due Diligence	10000

E0 a	Nama Caraanina	Tw.
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	Yes
	the last 12 months?	
59 a	If N, provide the date when the last Sanctions	
	EWRA was completed.	
60	Confirm that all responses provided in the above	Maria
	Section are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
61	If appropriate, provide any additional	
	information/context to the answers in this section.	
7 KVC CI	DD and EDD	
62	Does the Entity verify the identity of the customer?	Von
63	Do the Entity's policies and procedures set out when	Yes
	CDD must be completed, e.g. at the time of	Von
	onboarding or within 30 days?	Yes
64	Which of the following does the Entity gather and	
04	retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Vee
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	A STATE OF THE STA	Yes
64 e	Ownership structure	Yes
Ve (2009)	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	25%
	applied to beneficial ownership identification?	
67	Does the due diligence process result in customers	Yes
	receiving a risk classification?	100
67 a	If Y, what factors/criteria are used to determine the	
	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a	n.
	part of your KYC process?	No
68 a	If Y, is this at:	
68 a1	Onboarding	Please select
68 a2	KYC renewal	Please select
68 a3	Trigger event	Please select
68 a4	Other	Please select
68 a4a	If yes, please specify "Other"	
68 a4a	If yes, please specify "Other"	
68 a4a	If yes, please specify "Other"	
68 a4a	If yes, please specify "Other"	
380 380 350		
68 a4a 69	Does the Entity have a risk based approach to	Vac
380 380 350		Yes
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes
69 69 a	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? If Y, is this at:	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes Yes Yes

69 a3	Trigger ayent	V
70	Trigger event What is the method used by the Entity to screen for	Yes
	Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	No
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	EDD on risk-based approach
76 b	Respondent Banks	EDD on risk-based approach
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	EDD on risk-based approach
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	EDD on risk-based approach
76 i	Non-account customers	EDD on risk-based approach
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	
		EDD on risk-based approach
76 l 76 m	Nuclear power	Prohibited EDD on right based contacts
	Payment Service Providers	EDD on risk-based approach
76 n	PEPs	EDD on risk-based approach
76 o	PEP Close Associates	EDD on risk-based approach
76 p	PEP Related	EDD on risk-based approach
76 q	Precious metals and stones	EDD on risk-based approach
76 r	Red light businesses/Adult entertainment	Prohibited
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v	Unregulated charities	Prohibited
76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers	Prohibited
76 y	Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	Yes

78 a	If Y indicate who provides the approval:	Both
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Yes
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
82	If appropriate, provide any additional information/context to the answers in this section,	
8. MONITO	RING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	In general all suspicious transactions are monitored via Inter AML IT Tool. Generated hits are reviewed manually. Furthermore, in case of a suspicious activity report made by employees cases are reviewed manually as well.
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Vendor-sourced tools
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	InterTech
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	
9. PAYMEN	IT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group	W
	Payment Transparency Standards?	Yes

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
02.5	FATF Recommendation 16	V
93 a	AND A COURT OF THE	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	Financial Market Money Laundering Act (FM-GwG), Beneficial Owner Register Act (WiEReG), Banking Act (BWG), Payment Services Act (ZaDiG). All relevant laws are available in German language from https://ris.bka.gv.at/Bundesrecht/ (Enter the given abbreviation to Titel, Abkürzung). FMA circulars: https://www.fma.gv.at/en/fma/fma-circulars/
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC	TIONS	
98	Does the Entity have a Sanctions Policy approved by	
	management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Both Automated and Manual
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	InterTech, Fineksus
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?	Automated

105	Does the Entity have a data quality management	
(2) (2) (2) (3)	programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 с	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Not used
106 f	Other (specify)	Austrian Financial Market Authority (FMA), Austrian National Bank (OeNB), German Federal Financial Supervisory Authority (BaFIN), Internal List, various other World Check lists such as Crime, Terrorist lists, PEP, Narcotics, Vessel, etc.
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	
11. TRAININ	G & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 Ь	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:	week and the second
112 a 112 b	Board and Senior Committee Management 1st Line of Defence	Yes Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	No
112 f	Non-employed workers (contractors/consultants)	Not applicable
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes

and the branchies that this applies to. If appropriate, provide any additional information/controls to the answers in this section. 112. QUALITY ASSURANCE ICOMPLIANCE TESTING: 113. Description of the provided and the section of the control of			
Information/context to the answers in this section,	115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
117 Does the Entity have a program wide risk based Cusully Assurance programs for fam had climbe (separate from the independent Audit function)? 118 Does the Entity have a program wide risk based Compellance Teating process (separate from the independent Audit function)? 119 Confirm that all responses provided in the above Section are representative of all the LES branches. 110 a III., Canify withch questions the difference relate to an other independent Audit function)? 110 a Eappropriate, provide any additional information choice to the answers in this section. 110 a Eappropriate, provide any additional information choice to the answers in this section. 111 In addition to inspections by the government superviscors/regulations, does the Entity have an information and function, a tealing function or other independent third party to 95th, that assesses FCC products on a regular basil? 112 A bread of the Entity observation of the Entity have an information of the Entity observation of t	116		112f: No non-employed workers
117 Does the Entity have a program wide risk based Cusully Assurance programs for fam had climbe (separate from the independent Audit function)? 118 Does the Entity have a program wide risk based Compellance Teating process (separate from the independent Audit function)? 119 Confirm that all responses provided in the above Section are representative of all the LES branches. 110 a III., Canify withch questions the difference relate to an other independent Audit function)? 110 a Eappropriate, provide any additional information choice to the answers in this section. 110 a Eappropriate, provide any additional information choice to the answers in this section. 111 In addition to inspections by the government superviscors/regulations, does the Entity have an information and function, a tealing function or other independent third party to 95th, that assesses FCC products on a regular basil? 112 A bread of the Entity observation of the Entity have an information of the Entity observation of t	12 OHALIT	V ASSURANCE (COMPLIANCE TESTING	
Quality Assurance programme for financial crime (esparate form the independent Audit function)? 118 Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)? 119 Confirm that all responses provided in the above Section are representative of all the LE's branches 119 a III A clarify which questions the difference risket to and the branches that this applies to. 110 If appropriate, provide any additional information/context to the answers in this section. 111 Indefition to inspections by the government supervisor-frequipations, does the Entity have an internal audit function, a stating function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? 112 How often is the Entity sudicide on its AMA, CTF, ABC, Fraud and Sanctions programme by the following: 112 External Third Party Versity Section of the internal audit function and Sanctions policy and procedures 112 Destination of the internal audit function or other independent hind party cover the following areas: 112 A May, CTF, ABC, Fraud and Sanctions policy and procedures 112 A May, CTF, ABC, Fraud and Sanctions policy and procedures 112 A May, CTF, ABC, Fraud and Sanctions policy and procedures 112 A May, CTF, ABC, Fraud and Sanctions policy and procedures 112 A May, CTF, ABC, Fraud and Sanctions policy and procedures 112 A May, CTF, ABC, Fraud and Sanctions policy and procedures 112 A May, CTF, ABC, Fraud and Sanctions policy and procedures 112 A May, CTF, ABC, Fraud and Sanctions policy and procedures 112 A May, CTF, ABC, Fraud and Sanctions policy and procedures 112 A May, CTF, ABC, Fraud and Sanctions policy and procedures 112 A May, CTF, ABC, Fraud and Sanctions policy and procedures 112 A May, CTF, ABC, Fraud and Sanctions policy and procedures 112 A May, CTF, ABC, Fraud and Sanctions policy and procedures 112 A May, CTF, ABC, Fraud and Sanctions policy and procedures are provided by th			
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Section are representative of all the LE's branches 119 a. In Actify which questions the difference/s relate to and the branch/es that this applies to. 120 If appropriate, provide any additional information/context to the answers in this section. 121 In addition to hispactions by the government 121 In addition to hispactions by the government 121 In addition to hispactions by the government 122 In addition to hispactions by the government independent hid party or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policides and practices on a regular basis? 122 How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions policides and practices on a regular basis? 123 How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions policides and practices on a regular basis? 124 All party cover the following areas: 125 AML, CTF, ABC, Fraud and Sanctions policy and procedures the following areas: 126 AML, CTF, ABC, Fraud and Sanctions policy and procedures the following areas: 127 AML, CTF, ABC, Fraud and Sanctions policy and procedures the following areas: 128 Covernance 129 Covernance 120 AML, CTF, ABC, Fraud and Sanctions policy and procedures the following areas: 121 Covernance 122 AML, CTF, ABC, Fraud and Sanctions policy and procedures 123 AML SANCTODEDD and underlying methodologies 124 AML SANCTODEDD and underlying methodologies 125 AML SANCTODEDD and underlying methodologies 126 Version SANCTODEDD and underlying methodologies 127 AML SANCTODEDD and underlying methodologies 128 AML SANCTODEDD and underlying methodologies 129 Supplicious Activity Filing 129 Supplicious Activity Filing 120 Supplicious Activity Filing 121 Transaction Monitoring 122 AML SANCTODEDD and underlying methodologies 123 AML SANCTODEDD and underlying methodologies 124 Are adverse findings from internal & external audit tracked to completions and assessed for adequacy and completions and assessed for adequacy and completions and assessed for adequacy and completions and assess	11	Compliance Testing process (separate from the independent Audit function)?	Yes
and the branch/se shat this applies to. If appropriate, provide any additional information/context to the answers in this section. In addition to Impactions by the government information context to the answers in this section. In addition to Impaction by the government information or other independent third party or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? It would not be brained and the programme by the following: Yearly Yearly It was often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? It was not an experiment by the following: Yearly Year		Section are representative of all the LE's branches	Yes
information/context to the answers in this section. 13. AUDIT 121 In addition to inspections by the government apprevior-orisinguidators, does the Entity have an internal audit flunderon, and soft of the property of the	119 a		
In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent lithir planty, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	120		
In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent lithir planty, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	13. AUDIT		
Fraud and Sanctions programme by the following: 122 a Internal Audit Department 122 b External Third Party 123 Does the Internal audit function or other independent third party over the following areas: 123 a Does the Internal audit function or other independent third party over the following areas: 123 a AML, CTF, ABC, Fraud and Sanctions policy and procedures 123 b Enterprise Wide Risk Assessment 123 c Governance 123 d KYC/CDD/EDD and underlying methodologies 123 e Name Screening & List Management 124 C Reporting/Metrics & Management Information 125 Pess 126 Suspicious Activity Filing 126 Yes 127 Yes 127 Transaction Monitoring 127 Yes 128 I Transaction Monitoring 128 I Transing & Education 129 Yes 120 Other (specify) 120 Other (specify) 121 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 Inform that all responses provided in the above section are representative of all the LE's branches 126 If appropriate, provide any additional information/context to the answers in this section. 126 Does the Entity have a dedicated team responsible 127 Does the Entity have a dedicated team responsible 128 Does the Entity have a dedicated team responsible	121	supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and	Yes
External Third Party	122	Fraud and Sanctions programme by the following:	
Does the internal audit function or other independent third party cover the following areas: 123 a AML, CTF, ABC, Fraud and Sanctions policy and procedures 123 b Enterprise Wide Risk Assessment 123 c Governance 123 c KYC/CDD/EDD and underlying methodologies 123 e Name Screening & List Management 123 f Reporting/Metrics & Management Information 123 g Suspicious Activity Filing 123 h Technology 123 i Transaction Screening including for sanctions 123 i Transaction Screening including for sanctions 123 j Transaction Screening including for sanctions 123 j Transaction Screening including for sanctions 123 k Training & Education 124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 a If N, Clarify which questions the difference/s relate to and the branch/es that this applies to. 126 If appropriate, provide any additional information/context to the answers in this section. 127 Does the Entity have a dedicated team responsible 128 Does the Entity have a dedicated team responsible	122 a		
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127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible	14. FRAU	D	
	127	Does the Entity have policies in place addressing fraud risk?	Yes
	128		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.	DBAG has an "InterFraud" engine, where data is read in real time with implemented scenarios.
Wolfsberg (tion Statement Group Correspondent Banking Due Diligence Questionnaire 2023 (CE n Statement (To be signed by Global Head of Correspondent Bank by Laundering, Chief Compliance Officer, Global Head of Financial	king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of
	rt to remain in full compliance with all applicable financial crime laws	ion name) is fully committed to the fight against financial crime and makes s, regulations and standards in all of the jurisdictions in which it does business and holds accounts.
	egulatory obligations.	ve and sustainable controls to combat financial crime in order to protect its reputation and to meet its
The Finand standards.		ng parties to transactions in international payments and has adopted/is committed to adopting these
	cial Institution further certifies it complies with / is working to compl ation provided in this Wolfsberg CBDDQ will be kept current and v	y with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. vill be updated no less frequently than every eighteen months.
The Financ	cial Institution commits to file accurate supplemental information or	a timely basis.
I, Sema Yurtyapan Berger (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.		
Wolfsberg	CBDDQ are complete and correct to my honest belief, and that I a	ivalent), certify that I have read and understood this declaration, that the answers provided in this am authorised to execute this declaration on behalf of the Financial Institution.
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