the Wolfsberg Group

Financial Institution Name: Location (Country) :

SOCIETE GENERALE INTERNATIONAL LIMITED UNITED KINGDOM

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

No #	terially different than its Entity Head Office, a separate questionnaire can Question	
		Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	
		SOCIETE GENERALE INTERNATIONAL LIMITED
2	Append a list of foreign branches which are covered by this questionnaire	
	triis questiorinaire	N/A
3	Full Legal (Registered) Address	
		ONE BANK STREET, CANARY WHARF, LONDON, E14 4SG
		5.1
4	Full Primary Business Address (if different from above)	
		N/A
		IVA
5	Date of Entity incorporation/establishment	
		20th Marris 2005
		30th March 2005
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	Parent Company: SOCIETE GENERALE SA (100%)
	beneficial owners with a holding of 10% or more	Stock Code: GLE, EURONEXT PARIS ISIN: FR0000130809
		There are no ultimate beneficial owners of Societe Generale SA holding 10% or more of the capital or voting
		Trichts
7	% of the Entity's total shares composed of bearer shares	
		0
		U Company
8	Does the Entity, or any of its branches, operate under an	No
	Offshore Banking License (OBL)?	
8 a	If Y, provide the name of the relevant branch/es which	
	operate under an OBL	N/A
9	Does the Bank have a Virtual Bank License or provide	no
10	services only through online channels? Name of primary financial regulator/supervisory authority	
.0	Traine or primary interioral regulator/supervisory autifority	
		Financial Conduct Authority
11	Provide Legal Entity Identifier (LEI) if available	
11	Provide Legal Entity Identifier (LEI) if available	
		0IKLU6X1B10WK7X42C15
40	Drovide the full level name of the ultimate accord ""	
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	
	dinerality from the Entity completing the DDQ)	SOCIETE GENERALE SA
13	Jurisdiction of licensing authority and regulator of ultimate	
	parent	FRANCE, ACPR (Autorité de contrôle prudentiel et derésolution) & AMF (Autorité des Marchés Financiers)
		Europe: ECB (European Central Bank)
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	No .
14 b	Private Banking	No

14 c	Commercial Banking	No
14 d	Transactional Banking	No
14 e	Investment Banking	No
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	Yes
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	
14 K	Other (please explain)	
4-	D th- F-tit-hiift (400/)tf-li-	
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-	Yes
	resident means customers primarily resident in a different	133
	jurisdiction to the location where bank services are	
	provided)	
15 a	If Y, provide the top five countries where the non-	
	resident customers are located.	
	resident dustofficis are located.	United States of America, France, Japan, Cayman Islands and Ireland
		Since States of America, France, supari, Cayman Islands and Iroland
46	Select the closest value:	
16		204 520
<u>16 a</u>	Number of employees	201-500
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section	L
	are representative of all the LE's branches.	No branches
4= -	· · · · · · · · · · · · · · · · · · ·	
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.	
2. PRODU	ICTS & SERVICES	
19	Does the Entity offer the following products and services:	
13	Bood the Entity offer the following products that sorvices.	
19 a	Correspondent Banking	No
		INO
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking	
	services to domestic banks?	
19 a1b	Does the Entity allow domestic bank clients to	
	provide downstream relationships?	
19 a1c	Does the Entity have processes and procedures in	
.5 4 10	place to identify downstream relationships with	
40 . 4 .	domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking	
	services to foreign banks?	
19 a1e	Does the Entity allow downstream relationships	
	with foreign banks?	<u> </u>
19 a1f	Does the Entity have processes and procedures in	
	place to identify downstream relationships with	
	foreign banks?	
10 01~		
19 a1g	Does the Entity offer Correspondent Banking	
	services to regulated Money Services Businesses	
	(MSBs)/Money Value Transfer Services (MVTSs)?	
19 a1h	Does the Entity allow downstream relationships	
15 4 111	with MSBs, MVTSs, or Payment Service Provider	
	(PSPs)?	
<u>19 a1h1</u>	MSBs	No
19 a1h2	MVTSs	No
	PSPs	No
19 a1h3	P5P5	140

19 a1i		
	Does the Entity have processes and procedures in	
	place to identify downstream relationships with	
	MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	No
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No
19 f	International Cash Letter	No
19 g	Low Price Securities	Yes
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.
	oner ama party payment corridor to area casternere.	NO .
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	
19 15	Otilei - Flease explain	
19 j	Private Banking	No
	Remote Deposit Capture (RDC)	No
19 k		
19 I	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 n	Trade Finance	No
19 o	Virtual Assets	No
19 p	For each of the following please state whether you	
•	offer the service to walk-in customers and if so, the	
	applicable level of due diligence:	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	No
		NO
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	No
		140
19 p4a	If yes, state the applicable level of due diligence	
19 p5	If you offer other services to walk-in customers	
10 00		
15 p5		
15 po	please provide more detail here, including	N/A
10 00	please provide more detail here, including	N/A
10 00	please provide more detail here, including	N/A
	please provide more detail here, including describing the level of due diligence.	N/A
19 ps	please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the	N/A
	please provide more detail here, including describing the level of due diligence.	N/A
	please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the	N/A
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19 q	please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify)	
	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	N/A No branches
19 q	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.	
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19 q 20 20 a 21 3. AML, CT	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.	
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19 q 20 20 a 21 3. AML, CT	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. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	No branches
19 q 20 20 a 21 3. AML, CT 22	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. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise	No branches Yes
20 20 a 21 3. AML, CT 22 22 a 22 b	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. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening	No branches Yes Yes
19 q 20 20 a 21 3. AML, CT 22	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. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership	No branches Yes
20 20 a 21 3. AML, CT 22 22 a 22 b	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. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening	No branches Yes Yes
20 20 a 21 3. AML, CT 22 22 b 22 c 22 d	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. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting	No branches Yes Yes Yes Yes Yes Not Applicable
20 20 a 21 3. AML, CT 22 22 b 22 c 22 d 22 e	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. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting	No branches Yes Yes Yes Yes Not Applicable Yes
20 20 a 21 3. AML, CT 22 22 b 22 c 22 d	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. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	No branches Yes Yes Yes Yes Yes Not Applicable
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20 20 a 21 3. AML, CT 22 a 22 b 22 c 22 d 22 e 22 f 22 g	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. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing	No branches Yes Yes Yes Yes Yes Yes Yes Yes Yes
20 20 a 21 3. AML, CT 22 2 b 22 c 22 d 22 e 22 f 22 g 22 h	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. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review	No branches Yes Yes Yes Yes Yes Yes Yes Yes Not Applicable Yes Yes Yes Yes
20 20 a 21 a 21 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i	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. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	No branches Yes Yes Yes Yes Yes Not Applicable Yes Yes Yes Yes Yes
20 20 a 21 3. AML, CT 22 2 b 22 c 22 d 22 e 22 f 22 g 22 h	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. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review	No branches Yes Yes Yes Yes Yes Yes Yes Yes Not Applicable Yes Yes Yes Yes
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20 20 a 21 a 21 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i	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. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	No branches Yes Yes Yes Yes Yes Not Applicable Yes Yes Yes Yes Yes

22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML,	
23	CTF & Sanctions Compliance Department?	11-100
24	Is the Entity's AML, CTF & Sanctions policy approved at	
24		
	least annually by the Board or equivalent Senior	Yes
	Management Committee? If N, describe your practice in	
	Question 29.	
25	Does the Board receive, assess, and challenge regular	
	reporting on the status of the AML, CTF, & Sanctions	Yes
	programme?	
26	Does the Entity use third parties to carry out any	Vec
	components of its AML, CTF & Sanctions programme?	Yes
26 a	If Y, provide further details	
200	ii i, provide idialei detaile	All financial crime services are fully outsourced within the Group to Societe Generale SA (London Branch). SGLB
		further offshores some of the components to Societe Generale SA and Shared Service Centres in Romania and
		India.
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	No branches
28 a	If N, clarify which questions the difference/s relate to	
20 0	and the branch/es that this applies to.	
	and the branchies that this applies to.	
29	If appropriate, provide any additional information/context	
-	to the answers in this section.	
	·	
4. ANTI BE	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
••	consistent with applicable ABC regulations and	
	requirements to reasonably prevent, detect and report	Yes
	bribery and corruption?	
31	Does the Entity have an enterprise wide programme that	
31	sets minimum ABC standards?	Yes
20		
32	Has the Entity appointed a designated officer or officers	Vec
	with sufficient experience/expertise responsible for	Yes
	coordinating the ABC programme?	
33	Does the Entity have adequate staff with appropriate	
		v.
	levels of experience/expertise to implement the ABC	Yes
	programme?	
34	programme? Is the Entity's ABC programme applicable to:	Yes Third parties acting on behalf of the Entity
	programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that:	
34	programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This	
34 35	programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that:	
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34 35	programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	Third parties acting on behalf of the Entity
34 35	programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or	Third parties acting on behalf of the Entity
34 35 35 a	programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: 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	Third parties acting on behalf of the Entity Yes
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34 35 35 a	programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: 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 Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any	Third parties acting on behalf of the Entity Yes Yes
34 35 35 a	programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that: 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 Includes enhanced requirements regarding interaction with public officials? Includes a prohibition against the falsification of books	Third parties acting on behalf of the Entity Yes
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40	Ob	
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	Yes
	Procedures?	
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities 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	No branches
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	Yes
48 a1	If Y, does the Entity retain a record of the results?	Yes
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	Yes
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	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

Define the process for escalaring financial crime risk especial process and the process and the process and the process of the			
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57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 57 a Client Yes 57 b Product Yes 57 c Channel Yes 57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
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57 a Client Yes 57 b Product Yes 57 c Channel Yes 57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Yes 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 f 55 g 55 h 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
57 b Product Yes 57 c Channel Yes 57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 f 55 g 55 h 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
57 c Channel Yes 57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 b 54 c 54 d 55 b 55 a 55 b 55 c 55 d 55 e 55 h 56 a 55 h 56 a 57	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
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57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 b 54 c 54 d 55 a 55 b 55 c 55 d 55 b 55 c 55 f 55 d 55 h 56 a 57 a 57 a 57 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes
58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 Customer Due Diligence Yes 58 Governance Yes 58 C List Management Yes	54 a 54 b 54 c 54 d 55 a 55 b 55 c 55 d 55 b 55 c 55 f 55 d 55 h 56 a 57 a 57 a 57 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes
effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 b 55 c 55 d 55 c 55 d 55 f 55 g 55 h 56 a 57 a 57 b 57 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 a	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
58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 a	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
58 c List Management Yes	54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 d 55 6 55 f 55 d 55 f 55 c 55 f 55 d 5	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
	54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 b 55 c 55 d 55 f 55 g 55 h 56 a 57 b 57 c 57 d 58 58 a 58 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
	54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 b 55 c 55 d 55 f 55 g 55 h 56 a 57 b 57 c 57 d 58 58 a 58 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes
	54 a 54 b 54 c 54 d 55 5 5 5 b 55 c 55 d 55 c 55 d 55 h 56 a 57 a 57 a 57 a 57 c 57 d 58 a 58 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes
	54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 b 55 c 55 f 55 h 56 a 57 b 57 a 57 b 57 c 57 d 58 a 58 b 58 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance List Management	Yes

===	Name Canadaina	W
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	
33 a	was completed.	
	nas sompletoa.	
	C	
60	Confirm that all responses provided in the above Section	No branches
60 a	are representative of all the LE's branches If N, clarify which questions the difference/s relate to	
00 u	and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context	
61	to the answers in this section.	
	to the answers in this section.	
	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	Von
	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	
04	when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified? Authorised signatories (where applicable)	Yes
65 b	Key controllers	Yes Yes
65 c 65 d	Other relevant parties	ies
66	What is the Entity's minimum (lowest) threshold applied to	
00	beneficial ownership identification?	10%
67	Does the due diligence process result in customers	V
	receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the	
	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography Business Type/Industry	Yes
67 a3 67 a4	Legal Entity type	Yes Yes
67 a4 67 a5	Adverse Information	Yes
67 a6	Other (specify)	Age of entity
	(-F)	Length of relationship
		PEP/SPO
		Transactions/payments volume
68	For high risk non-individual customers, is a site visit a part	LSanctions exposure
50	of your KYC process?	Yes
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
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?	Yes
69 a	If Y, is this at:	
69 a1	Onboarding KYC renewal	
69 a2		

69 a3	Trigger event	
70	What is the method used by the Entity to screen for	
10		
	Adverse Media/Negative News?	
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?	
	,	
	16.74 : 41 : 4	
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
		Tes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
		Combination of automated and manual
73	Does the Entity have policies, procedures and processes	
13		
	to review and escalate potential matches from screening	
	customers and connected parties to determine whether	Yes
	they are PEPs, or controlled by PEPs?	
	, , ,	
74	Is KYC renewed at defined frequencies based on risk	
/4		Yes
	rating (Periodic Reviews)?	
74 a	If yes, select all that apply:	
74 a1	Less than one year	No
74 a2	1 – 2 years	Yes
	3 – 4 years	Yes
74 a3		
74 a4	5 years or more	No
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
74 40	Outor (Floude speekly)	
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	Do not have this category of customer or industry
76 b1	If EDD or restricted, does the EDD assessment	
	contain the elements as set out in the Wolfsberg	
	Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	Do not have this category of customer or industry
76 d	Extractive industries	Always subject to EDD
76 e	Gambling customers	Do not have this category of customer or industry
76 f	General Trading Companies	Do not have this category of customer or industry
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	Do not have this category of customer or industry
76 i	Non-account customers	Do not have this category of customer or industry
76 j	Non-Government Organisations	Do not have this category of customer or industry
76 k	Non-resident customers	EDD on risk-based approach
76 I	Nuclear power	EDD on risk-based approach
	INDUCAL DUWCI	
76 m	Payment Service Providers	Do not have this category of customer or industry
76 m 76 n		
76 n	Payment Service Providers PEPs	Do not have this category of customer or industry EDD on risk-based approach
76 n 76 o	Payment Service Providers PEPs PEP Close Associates	Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach
76 n 76 o 76 p	Payment Service Providers PEPs PEP Close Associates PEP Related	Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach
76 n 76 o 76 p 76 q	Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones	Do not have this category of customer or industry EDD on risk-based approach
76 n 76 o 76 p	Payment Service Providers PEPs PEP Close Associates PEP Related	Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach
76 n 76 o 76 p 76 q 76 r	Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones	Do not have this category of customer or industry EDD on risk-based approach
76 n 76 o 76 p 76 q 76 r 76 s	Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities	Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry
76 n 76 o 76 p 76 q 76 r 76 s 76 t	Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks	Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Prohibited
76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u	Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies	Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Prohibited Do not have this category of customer or industry
76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v	Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities	Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on thisk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Prohibited Do not have this category of customer or industry Do not have this category of customer or industry
76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u	Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers	Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Prohibited Do not have this category of customer or industry
76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 t 76 u 76 v 76 w	Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities	Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Prohibited Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry
76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 x	Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on the sategory of customer or industry Do not have this category of customer or industry Prohibited Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry
76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w	Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers	Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Prohibited Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry
76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 x	Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on thisk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Prohibited Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry
76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 v 76 w	Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Prohibited Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry
76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 v 76 w	Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on the based approach Do not have this category of customer or industry Do not have this category of customer or industry Prohibited Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry
76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 x 76 y	Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on the based approach Do not have this category of customer or industry Do not have this category of customer or industry Prohibited Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry
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8. Does the Entity perform an additional control or quality review on clients subject to EDD? 10. Combin this all responses provided in the above Section in the above Section in the above Section and the branches that this applies to and the branches that this applies to and the branches that this applies to the aniwers in this section. 12. If appropriate, provide any additional information/context to the aniwers in this section. 13. MONITORING & REPORTING 14. What is the method used by the Entity to monitor of the aniwers in this section. 15. MONITORING & REPORTING 16. MONITORING & REPORTING 16. MONITORING & REPORTING 17. What is the method used by the Entity to monitor of the aniwers in this section. 18. MONITORING & REPORTING 19. MONITORING & REPORTING 20. Does the Entity have be about complete data or all the properties of the Carlothers and processes in place to respond to the complete data or all the properties of the Carlothers and processes in place to respond to the complete data or all the processes in place to respond to the Carlothers and processes in place to respond to the Carlothers and Entire Monitoring or all the Carlothers and Enti		Does the Entity have specific procedures for onboarding	
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93	Does the Entity have policies, procedures and processes	
	to comply with and have controls in place to ensure	
	compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	EU regulations 847-2015 implemented via The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and it's subsequent amendments.
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	No branches
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. SANCT	TIONS	
98	Does the Entity have a Sanctions Policy approved by	
	management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Both Automated and Manual
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Both
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Fircosoft
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	< 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 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	Used for screening customers and beneficial owners and for filtering transactional data
106 b	Sanctions List (UN) United States Department of the Treasury's Office of	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Foreign Assets Control (OFAC) Office of Financial Sanctions Implementation HMT	Used for screening customers and beneficial owners and for filtering transactional data
	(OFSI)	2000 to concerning easterness and periodicial emities and for flicening transactional data

106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Other (specify)	Seed to concerning describing and periodical owners and for intering transactional data
1001	Oner (specify)	UAE, Swiss, and any other local list as it may be required by relevant local regulations
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	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	No branches
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 c	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	Third parties to which specific FCC activities have been outsourced	Yes
112 f	Non-employed workers (contractors/consultants)	Yes
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?	
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches

### Author Figure Provided any additional information/content to the answers in this section. ### Tapopoprise, provide any additional information/content to the answers in this section. ### Tapopoprise, provide any additional information/content to the answers in this section. ### Tapopoprise, provide any additional information/content to the answers in this section. ### Tapopoprise, provide any additional information/content to the answers in this section. ### Tapopoprise, provide any additional information/content to the information and the provided in the above Section ### Tapopoprise, provide any additional information/content to the answers in this section. #### Tapopoprise, provide any additional information/content to the disease in this section. #### Tapopoprise, provide any additional information/content to the disease in this section. #### Tapopoprise, provide any additional information/content to the disease in this section. #### Tapopoprise, provide any additional information/content to the disease in this section. ##### Tapopoprise, provide any additional information/content to the disease in this section. ###################################	115 a	term to the state of the state	
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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. 14. FRAUD 127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible for	123 b 123 c 123 d 123 e 123 f 123 g 123 j 123 i 123 i 123 i 123 i	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	Yes
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126 If appropriate, provide any additional information/context to the answers in this section. 14. FRAUD 17 Does the Entity have policies in place addressing fraud risk? 18 Does the Entity have a dedicated team responsible for	123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 i 123 j 123 k 123 l	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?	Yes
and the branch/es that this applies to. 126	123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 i 123 j 123 k 123 l	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? Confirm that all responses provided in the above section	Yes
126 If appropriate, provide any additional information/context to the answers in this section. 14. FRAUD 127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible for	123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k 123 l	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	Yes
to the answers in this section. 14. FRAUD 127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible for Ves	123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k 123 l	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	Yes
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14. FRAUD 127 Does the Entity have policies in place addressing fraud risk? Yes 128 Does the Entity have a dedicated team responsible for Yes	123 b 123 c 123 d 123 e 123 f 123 g 123 i 123 i 123 i 123 i 123 c	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.	Yes
127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible for Ves	123 b 123 c 123 d 123 e 123 f 123 g 123 i 123 i 123 i 123 i 123 c	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? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Yes
127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible for Ves	123 b 123 c 123 d 123 e 123 f 123 g 123 i 123 i 123 i 123 i 123 c	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? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Yes
127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible for Ves	123 b 123 c 123 d 123 e 123 f 123 g 123 i 123 i 123 i 123 i 123 c	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? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Yes
127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible for Ves	123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k 123 l	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.	Yes
risk? 128 Does the Entity have a dedicated team responsible for Ves	123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k 123 l	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.	Yes
	123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k 123 l 125 a 126	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.	Yes
	123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k 123 l 125 a 126	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? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Yes
preventing & detecting fraud?	123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 i 123 i 123 c 125 a 126	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.	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	No branches
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.	128) There is 1 FTE in RISQ/OPE (UK Fraud Risk Manager). 129) Watch controls covering SGIL are specifically designed to mitigate the risk of fraud. 130) Information is gathered as part of Watch controls as well as specific information which is obtained as part of fraud investigations.

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)

Societe Generale International Limited (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 obliqations.

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

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

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

l, Marianne Botoulas (Chief Compliance Officer), 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.

l, Rhys Hersey (MLRO), 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.