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

## the Wolfsberg Group

Financial Institution Name: Location (Country) :

Banca Monte dei Paschi di Siena Italy

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.#	Ougation	Amourou
No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	Banca Monte dei Paschi di Siena S.p.A.
		'
2	Append a list of foreign branches which are covered	All the liver have a horse and the foreign house horse had
	by this questionnaire	All Italian branches and the foreign branch of Shanghai
3	Full Legal (Registered) Address	
١	I uli Legal (Negistereu) Address	Piazza Salimbeni n. 3, 53100 Siena - Italy
4	Full Primary Business Address (if different from	
	above)	
5	Date of Entity incorporation/establishment	QE Avenue 400E
	, , , , , , , , , , , , , , , , , , , ,	25 August 1995
c	Colort time of aumorabin and annual an aumorabin	
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker	Borsa Italiana S.P.A MTA - Isin IT0005218752
	symbol	
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	Yes
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	
7	0/ 6/1 5 8/1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
'	% of the Entity's total shares composed of bearer shares	0%
	snares	
8	Does the Entity, or any of its branches, operate under	No
	an Offshore Banking License (OBL)?	INO
8 a	If Y, provide the name of the relevant branch/es	
	which operate under an OBL	
9	Does the Bank have a Virtual Bank License or	
ľ	provide services only through online channels?	No
10	Name of primary financial regulator/supervisory	
10	authority	Banca d'Italia/BCE
	addionsy	
11	Provide Legal Entity Identifier (LEI) if available	J4CP7MHCXR8DAQMKIL78
		OTOL THILIOM ODDAQIVILLED
12	Provide the full legal name of the ultimate parent (if	
- <b>-</b>	different from the Entity completing the DDQ)	Not Applicable
I		

13	Jurisdiction of licensing authority and regulator of	Not Applicable
	ultimate parent	Not Applicable
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b	9	
	Private Banking	Yes
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
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	Yes
14 k	Other (please explain)	
1.4.1	Carlot (picade explain)	
15	Does the Entity have a significant (10% or more)	
	portfolio of non-resident customers or does it derive	
1	more than 10% of its revenue from non-resident	N.
1	customers? (Non-resident means customers primarily	No
1	resident in a different jurisdiction to the location	
1	where bank services are provided)	
15 a	If Y, provide the top five countries where the non-	
15 a	resident customers are located.	
	resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	10001+
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches.	No
17 a	If N, clarify which questions the difference/s relate to	
117 0	and the branch/es that this applies to.	10: Shanghai Branch is also regulated by China respective Competent Authorities.
	and the branchies that this applies to.	14: Shanghai Branch does not provide services and products listed in points
		14b,14d,14e,14g,14h,14i,14j.
18	If appropriate, provide any additional	
	information/context to the answers in this section.	Banca Monte dei Paschi di Siena S.p.A., or hereinafter: BMPS.
		6: https://www.gruppomps.it/en/corporate-governance/shareholding-structure.html
2 PPODII	TES & SERVICES	
19	Does the Entity offer the following products and	
119	Isoers the Entity offer the following products and Isoervices:	
40 -		W.
19 a	Correspondent Banking	Yes
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking	Yes
	services to domestic banks?	163
19 a1b	Does the Entity allow domestic bank clients to	Na
1	provide downstream relationships?	No
19 a1c	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	Yes
1	domestic banks?	163
40 .4 .		
170 074		
19 a1d	Does the Entity offer Correspondent Banking	Yes
	Does the Entity offer Correspondent Banking services to foreign banks?	Yes
19 a1d 19 a1e	Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships	
19 a1e	Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?	Yes No
	Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships	
19 a1e	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	
19 a1e	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	No .
19 a1e	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 .
19 a1e	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	No Yes
19 a1e	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 .
19 a1e 19 a1f 19 a1g	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 Yes
19 a1e	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 Yes
19 a1e 19 a1f 19 a1g	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 Yes
19 a1e 19 a1f 19 a1g	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 Yes
19 a1e 19 a1f 19 a1g	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 Yes No
19 a1e 19 a1f 19 a1g 19 a1h	Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	No Yes No No
19 a1e 19 a1f 19 a1g 19 a1g	Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	No Yes No

19 a1i		
	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	Yes
10	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	Yes
19 e	Hold Mail	Yes
19 f	International Cash Letter	Yes
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	Yes
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	Yes
19 i3	Virtual Asset Service Providers (VASPs)	No
19 i4	eCommerce Platforms	No
19 i5	Other - Please explain	
19 j	Private Banking	Both
19 k	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	Yes
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	Yes
19 p1a	If yes, state the applicable level of due diligence	Identification and verification
19 p2	Wire transfers	Yes
19 p2a	If yes, state the applicable level of due diligence	Identification and verification
19 p3	Foreign currency conversion	Yes
19 p3a	If yes, state the applicable level of due diligence	Identification and verification
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	Please select
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	tax payments, other payments as promissory note, payment slip (italian "Effetti e bollettini") level of due diligence: identification and verification
19 q	Other high-risk products and services identified by the Entity (please specify)	No
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	No
20 20 a	· · ·	No  19: Shanghai Branch does not provide services and products listed in points 19a,19d,19e,19f,19g,19h,19i,19j,19k,19l, 19m, 19o
	Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to	19: Shanghai Branch does not provide services and products listed in points
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20 a	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	19: Shanghai Branch does not provide services and products listed in points 19a,19d,19e,19f,19g,19h,19i,19j,19k,19l, 19m, 19o  19a1e: BMPS provides downstream relationship only to its local and foreign subsidiaries. 19 a1i: BMPS refrains from entering into or continuing a business relationship with MSB dealing involving high ML-FT risk countries.
20 a 21 3. AML, C	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.	19: Shanghai Branch does not provide services and products listed in points 19a,19d,19e,19f,19g,19h,19i,19j,19k,19l, 19m, 19o  19a1e: BMPS provides downstream relationship only to its local and foreign subsidiaries. 19 a1: BMPS refrains from entering into or continuing a business relationship with MSB dealing involving high ML-FT risk countries.
20 a 21 3. AML, C 22 22 a	Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient	19: Shanghai Branch does not provide services and products listed in points 19a,19d,19e,19f,19g,19h,19i,19j,19k,19l, 19m, 19o  19a1e: BMPS provides downstream relationship only to its local and foreign subsidiaries. 19 a1: BMPS refrains from entering into or continuing a business relationship with MSB dealing involving high ML-FT risk countries.
20 a  21  3. AML, C  22  22 a  22 b	Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient Adverse Information Screening	19: Shanghai Branch does not provide services and products listed in points 19a,19d,19e,19f,19g,19h,19i,19j,19k,19l, 19m, 19o  19a1e: BMPS provides downstream relationship only to its local and foreign subsidiaries. 19 a1i: BMPS refrains from entering into or continuing a business relationship with MSB dealing involving high ML-FT risk countries.
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20 a  21  3. AML, C  22  22 a  22 b  22 c  22 d	Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting	19: Shanghai Branch does not provide services and products listed in points 19a,19d,19e,19f,19g,19h,19i,19j,19k,19l, 19m, 19o  19a1e: BMPS provides downstream relationship only to its local and foreign subsidiaries. 19 a1i: BMPS refrains from entering into or continuing a business relationship with MSB dealing involving high ML-FT risk countries.  Yes
20 a  21  3. AML, C  22  22 a  22 b  22 c  22 d  22 e	Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient  Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD	19: Shanghai Branch does not provide services and products listed in points 19a,19d,19e,19f,19g,19h,19i,19j,19k,19l, 19m, 19o  19a1e: BMPS provides downstream relationship only to its local and foreign subsidiaries. 19 a1i: BMPS refrains from entering into or continuing a business relationship with MSB dealing involving high ML-FT risk countries.  Yes  Yes  Yes
20 a  21  3. AML, C  22  22 a  22 b  22 c  22 d	Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting	19: Shanghai Branch does not provide services and products listed in points 19a,19d,19e,19f,19g,19h,19i,19j,19k,19l, 19m, 19o  19a1e: BMPS provides downstream relationship only to its local and foreign subsidiaries. 19 a1i: BMPS refrains from entering into or continuing a business relationship with MSB dealing involving high ML-FT risk countries.  Yes Yes Yes Yes
20 a  21  3. AML, C  22  22 a  22 b  22 c  22 d  22 e	Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient  Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD	19: Shanghai Branch does not provide services and products listed in points 19a,19d,19e,19f,19g,19h,19i,19j,19k,19l, 19m, 19o  19a1e: BMPS provides downstream relationship only to its local and foreign subsidiaries. 19 a1i: BMPS refrains from entering into or continuing a business relationship with MSB dealing involving high ML-FT risk countries.  Yes Yes Yes Yes Yes
20 a  21  3. AML, C  22  22 a  22 b  22 c  22 d  22 e  22 f	Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	19: Shanghai Branch does not provide services and products listed in points 19a,19d,19e,19f,19g,19h,19i,19j,19k,19l, 19m, 19o  19a1e: BMPS provides downstream relationship only to its local and foreign subsidiaries. 19 a1i: BMPS refrains from entering into or continuing a business relationship with MSB dealing involving high ML-FT risk countries.  Yes  Yes  Yes  Yes  Yes  Yes
20 a  21  3. AML, C  22  22 a  22 b  22 c  22 d  22 e  22 f  22 g	Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient  Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing	19: Shanghai Branch does not provide services and products listed in points 19a,19d,19e,19f,19g,19h,19i,19j,19k,19l, 19m, 19o  19a1e: BMPS provides downstream relationship only to its local and foreign subsidiaries. 19 a1i: BMPS refrains from entering into or continuing a business relationship with MSB dealing involving high ML-FT risk countries.  Yes Yes Yes Yes Yes Yes Yes
20 a  21  3. AML, C  22  22 a  22 b  22 c  22 d  22 e  22 f  22 g  22 h	Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing Periodic Review	19: Shanghai Branch does not provide services and products listed in points 19a,19d,19e,19f,19g,19h,19i,19j,19k,19l, 19m, 19o  19a1e: BMPS provides downstream relationship only to its local and foreign subsidiaries. 19 a1i: BMPS refrains from entering into or continuing a business relationship with MSB dealing involving high ML-FT risk countries.  Yes Yes Yes Yes Yes Yes Yes Yes Yes
20 a  21  3. AML, C  22  22 a  22 b  22 c  22 d  22 e  22 f  22 g  22 h  22 i	Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing Periodic Review Policies and Procedures	19: Shanghai Branch does not provide services and products listed in points 19a,19d,19e,19f,19g,19h,19i,19j,19k,19l, 19m, 19o  19a1e: BMPS provides downstream relationship only to its local and foreign subsidiaries. 19 a1i: BMPS refrains from entering into or continuing a business relationship with MSB dealing involving high ML-FT risk countries.  Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye

22 m	Suspicious Activity Reporting	Yes
22 m	Training and Education	Yes
22 n	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	11-100
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	No
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.	Effective from 1 April 2021, the MPS Group has chosen a mixed model, centralized for the Italian subsidiaries and decentralized for the foreign branches and foreign subsidiaries. The Head of AML is the Head of the Chief Risk Officer, who reports to the Board of Directors directly. 24: The AML Function reviews the policy at least annually, updates it if and where necessary and submits the new text to the Chief Executive Officer for the approval of the Board of Directors.
4. ANTI E	RIBERY & CORRUPTION	of Directors.
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?	No
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	No
38 a	If N, provide the date when the last ABC EWRA was completed.	It was completed at the end 2021, overall approved by the Board of Directors on June 16, 2022
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 c	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	No
42 f	Non-employed workers as appropriate (contractors/consultants)	No
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	No
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
5 AMI O	TE & CANCELONG BOLLOIFO & BROOFFILIBEO	
	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 с	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close	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"	No
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.	49n: The bank uses external Providers (i.e. World Check, Compliance daily, Cogito Intelligence Platform)
6. AML, CTF	& SANCTIONS RISK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 a	Client	Yes
54 b	Product Channel	Yes Yes
	I Channel	
54 c		
54 d 55	Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes
54 d 55 55 a	Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring	
54 d 55 55 a 55 b	Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring Customer Due Diligence	Yes Yes Yes
54 d 55 55 a 55 b 55 c	Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification	Yes Yes Yes Yes
54 d 55 55 a 55 b	Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring Customer Due Diligence	Yes Yes
54 d 55 55 a 55 b 55 c 55 d	Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative	Yes Yes Yes Yes Yes Yes Yes Yes
54 d 55 55 a 55 b 55 c 55 d 55 e	Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes Yes Yes Yes Yes Yes
54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	Yes Yes Yes Yes Yes Yes Yes Yes
54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed	Yes
54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56	Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 h 56	Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
54 d 55 55 a 55 b 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes
54 d 55 55 a 55 b 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57	Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
54 d 55 55 a 55 b 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes
54 d 55 55 a 55 b 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57 a 57 b 57 c 57 d	Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
54 d 55 55 a 55 a 55 b 55 c 55 d 55 c 55 d 55 s 55 f 55 g 55 h 56 56 a 57 a 57 a 57 a 57 d 58 58 a	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 d 55 55 a 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a 57 57 a 57 a 57 c 57 d 58 58 a 58 b	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 d 55 55 a 55 a 55 b 55 c 55 d 55 c 55 d 55 s 55 f 55 g 55 h 56 56 a 57 a 57 a 57 a 57 d 58 58 a	Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes

58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in	V
	the last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
	Evviva was completed.	
60	Confirm that all responses provided in the above	Yes
	Section are representative of all the LE's branches	
60 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
61	If appropriate, provide any additional	55e: BMPS procedures involve manual name screening against negative media and negative news
	information/context to the answers in this section.	during customer due diligence and periodic review
7 KYC CE	DD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	163
	CDD must be completed, e.g. at the time of	Yes
	onboarding or within 30 days?	100
64	Which of the following does the Entity gather and	
-	retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Voo
64 b	Expected activity	Yes Yes
64 c		
	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e 64 f	Product usage	Yes
	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)	Presence of other negative news, presence of Suspicious Activity Reports, presence in a Sanction
		list or related to a sanctioned Person, PEP's classification.
68	For high risk non-individual customers, is a site visit a	No
	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"	
69	Does the Entity have a risk based approach to	
	screening customers for Adverse Media/Negative	Yes
	News?	103
69 a	If Y, is this at:	
υσα		
60 21	Onhoarding	
69 a1 69 a2	Onboarding  KYC renewal	Yes Yes

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	
	Adverse Media/Negative News?	Combination of automated and manual
71	<u> </u>	
/ 1	Does the Entity have a risk based approach to screening	
	customers and connected parties to determine whether	Yes
	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	Yes
	they are PEPs, or controlled by PEPs?	
-	Is KYC renewed at defined frequencies based on risk	
74	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	No
74 a4	-	
	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
75	Description of the second of t	
75	Does the Entity maintain and report metrics on current	
	and past periodic or trigger event due diligence	Yes
	reviews?	
76	From the list below, which categories of customers or	
-	industries are subject to EDD and/or are restricted, or	
	prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Always subject to EDD
76 b	Respondent Banks	EDD on risk-based approach
76 b1	If EDD or restricted, does the EDD assessment	
70 01	contain the elements as set out in the Wolfsberg	· ·
		Yes
	Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	Always subject to EDD
76 d	Extractive industries	Always subject to EDD
-		
76 e	Gambling customers	Always subject to EDD
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Restricted
	7.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1	
76 h	MSB/MVTS customers	Always subject to EDD
76 i	Non-account customers	EDD on risk-based approach
76 j	Non-Government Organisations	Restricted
	Ÿ	
76 k	Non-resident customers	EDD on risk-based approach
76 I	Nuclear power	EDD on risk-based approach
76 m	Payment Service Providers	EDD on risk-based approach
76 n	PEPs	
		Always subject to EDD
76 o	PEP Close Associates	Always subject to EDD
76 p	PEP Related	Always subject to EDD
	Precious metals and stones	
76 q		Always subject to EDD
76 r	Red light businesses/Adult entertainment	Restricted
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	Restricted
76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers	Always subject to EDD
76 y	Other (specify)	Cash-for-gold, Waste collection and disposal, Production of renewable energy, Construction,
		Supply of pharmaceutical instruments, Trust companies and Foundations. EAlways subject to EDD
	10 414 4 41 41 41 41	
77	If restricted, provide details of the restriction	Absence of mandatory Governamental authorizations, financial activities with high "AML-CFT" risk
′′		
<b>''</b>		countries etc
11		countries etc
,,,		countries etc
	Dece FDD require and a business	countries etc
78	Does EDD require senior business management and/ or compliance approval?	countries etc Yes

Bit   Indicates who provides the approval   Page	70 6	If V indicate who provides the accessory	Dath
subverse, accountaints, consultaints, real estates agents?  10 Does the Entity perform an additional control or quality review on clinical subject to EDD?  11 Confirm that all responses provided in the above and the control or an additional control or an additional responses provided in the above and the control or the additional information from the above and the control or the additional information (context to the answers in this section.  12 If appropriate, provided any additional information (context to the answers in this section.  13 If appropriate, provided any additional information (context to the answers in this section.  14 If appropriate, provided any additional information (context to the answers in this section.  15 If a section is the context of the control of the control or not prohibited purposes.  16 If a section is the control of the control or not prohibited purposes.  17 If a section is the control of the control or not prohibited purposes.  18 If a section is the control of the control or not prohibited purposes.  19 If a section is the control of the control or not prohibited purposes.  19 If a section is the control of the sectification of the section of the control of the control of the section of the sect			Both
lawyers, accountment, consultante, resile stake agents?   96	79		Voo
Does the Entity perform an additional control or quality roles on clinical support when on clinical supports per performance in the above Section are propresentative of all the LES transches of an are propresentative of all the LES transches of all the clinical supports of the advice of the control supports of all the LES transches of the control supports of all the LES transches of the control supports of the application of the advice of the control supports of the application of the advice of the control supports of the application of the advice of the control supports of the application of the advice of the control supports of the application of the advice of the control supports of the advice of the identification and reporting of suspicious activities?    1			Tes
quality review on clients subject to ED0?  10 Combine that all responses provided in the sub- Section are representative of all the LE transches  11 a III. Note that which questions the differences related to and the branches that this applies to  12 If appropriate, provide any additional information/control to the university in this section.  23 If appropriate, provide any additional information/control to the university in this section.  24 If appropriate, provide any additional information/control to the university in this section.  25 If appropriate, provide any additional information/control to the university in this section.  26 If appropriate, provide any additional information/control to the university in this section.  27 If a sestablish to deal with customers only if licenced by fallers/EU gov to trade in these inclusions.  28 If appropriate, provide any additional information/control to the university in the fallers of the fallers of the destification and upporting of despitions activity.  29 If audiomated any the Entity to monitor transactions for assignous activities?  29 If audiomated or combinations selected, expectly what type of fransactions are monitored manually type of fransactions are monitored manually information revented resourced froits selected, what is the name of the vendorhoor?  20 If audiomated or combination selected, are internal ayestem or world-resourced froits selected, what is the name of the vendorhoor?  21 If audiomated or combination selected, are internal ayestem or world-resourced froits selected. what is the name of the vendorhoor?  22 If audiomated or combination selected, are internal ayestem or world-resourced froits selected.  22 If audiomated or combination selected.  23 If audiomated or combination selected, are internal ayestem or world-resourced froits selected.  24 If audiomated or combination selected.  25 If audiomated or combination selected.  26 If audiomated or combination selected.  27 If a session is a selected or combination selected.  28 If a selected	80		
Section are representative of all the LE branches 18 a   If calify which questions the differences relate to and the branches has this applies to and the branches has this applies to and the branches has this applies to the property of th			Yes
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### Paperopriate, provide any additional information to the answers in this section.  ### Paperopriate, provide any additional information to the answers in this section.  ### Paperopriate, provide any additional information to the answers in this section.  ### Paperopriate, provide any additional information to the answers in this section.  ### Paperopriate, provide any additional information to the answers in this section.  ### Paperopriate, provide any additional information to the provide prov		•	Yes
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s. MONITORING & REPORTING  8. Monitoring processes for the determination of the Intellan Law Processes and monitoring processes for the determination and processes for the processes in procedures and processes for comply with suspicious transaction of processes for determination and analysis of the determination and processes for determination and analysis of the determination and processes for determination and analysis of the		and the branch/es that this applies to	
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8. MONITORING & REPORTING  32 Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?  34 What is the method used by the Entity to monitor transactions for suspicious activities?  34 If manual or combination selected, spedify what type of transactions are monitored manually by the pranches The transch operator enters the report in the procedure in order to allow the assessment by the character and the pranches The transch operator enters the report in the procedure in order to allow the assessment by the character and the pranches The transch operator enters the report in the procedure in order to allow the assessment by the transchape that the proper in the procedure in order to allow the assessment by the transchape that the proper in the procedure in order to allow the assessment by the transchape that the proper in the procedure in order to allow the assessment by the transchape that the proper in the procedure in order to allow the assessment by the transchape and by the MLRO for the possible forwarding to the PIU  44 bit of the description of the procedure of the procedure and processes to previous and processes to comply with suspicious transactions?  45 bit of the processes of previous and escapital matters arising from the monitoring of customer transactions and activity?  47 Does the Entity have policies, procedures and processes for review and complete data for all transactions are subject to monitoring?  48 Does the Entity have policies, procedures and activity?  49 Does the Entity have processes in place to respond to Request For Information (RFIs) to their customers in a representative of all the LEV branches in a term year manuer?  49 Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a representative of all the LEV branches in all the branches to the answers in this section.  49 Does the Entity have provide any additional with the provided any additional with the		information/context to the answers in this section.	
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and monitoring processes for the identification and reporting of suspicious activity?  What is the method used by the Entity to monitor transactions for suspicious activities?  The manual of combination selected, specify what type of transactions are monitored manually type of transactions are monitored manually by the branch poperator orders the report in the procedure in order to allow the assessment by the MLRO for the possible forwarding to the FIU the assessment by the branch manager and by the MLRO for the possible forwarding to the FIU standard or combination selected, are internal system or vendor-sourced tools used?  If flutomated or combination selected, are internal the name of the vendor/sourced tools used?  If Vendor-sourced tools report in the processible forwarding to the FIU the assessment by the branch manager and by the MLRO for the possible forwarding to the FIU the assessment by the branch manager and by the MLRO for the possible forwarding to the FIU the assessment by the branch manager and by the MLRO for the possible forwarding to the FIU the assessment by the branch manager and by the MLRO for the possible forwarding to the FIU the assessment by system or vendor-sourced tools used?  Vendor-sourced tools  Tour Camans  The manual processed tools when the processed of the vendor/fool?  Tour Camans  The manual processed tools when the processed of the proces	8. MONIT	ORING & REPORTING	
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92 Does the Entity adhere to the Wolfsberg Group		information/context to the answers in this section.	
92 Does the Entity adhere to the Wolfsberg Group			
92 Does the Entity adhere to the Wolfsberg Group			
Voc		NT TRANSPARENCY	
Payment Transparency Standards?	92		Yes
		Payment Transparency Standards?	155

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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	Italian Legislative Decree 231/2007 as amended by Legislative Decree 90/2017 and 125/2019, appliyng Directive (EU) 2015/849 and 2018/843
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC	TIONS	
98	Does the Entity have a Sanctions Policy approved by	
30	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?	Metisoft - Kant Refinitiv - World Check
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Combination of automated and manual

105	Does the Entity have a data quality management	
	programme to ensure that complete data for all	Yes
	transactions are subject to sanctions screening?	
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 c	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)	Locally applicable lists in each jurisdiction if foreseen by local legislation.
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?	Yes
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.	108: Representative office of Moscow (Russian Federation), no transactional operations are carried out
11. TRAINI	NG & EDUCATION	
111	Does the Entity provide mandatory training, which	
	includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 с	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	Yes
112 b 112 c	1st Line of Defence 2nd Line of Defence	Yes
112 c 112 d	3rd Line of Defence	Yes Yes
112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
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?	
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes

115 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
116	If appropriate, provide any additional	
	information/context to the answers in this section.	The Anti-Money Laundering Function collaborates with the Chief Human Capital Officer for an adequate training plan aimed at updating all staff on an ongoing basis, sometimes using external
		consultancy to prepare the material used during the courses. The AML-CFT training plan is annual
10.01111		
12. QUALII 117	Y ASSURANCE /COMPLIANCE TESTING  Does the Entity have a program wide risk based	
	Quality Assurance programme for financial crime	Yes
	(separate from the independent Audit function)?	
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the	Yes
	independent Audit function)?	165
119	Confirm that all responses provided in the above	Yes
110	Section are representative of all the LE's branches	165
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
	imornation/context to the answers in this section.	
13. AUDIT	<u> </u>	
121	In addition to inspections by the government	
	supervisors/regulators, does the Entity have an internal audit function, a testing function or other	
	independent third party, or both, that assesses FCC	Yes
	AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	
122	How often is the Entity audited on its AML, CTF, ABC,	
122	Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Component-based reviews
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and	
	procedures	Yes
123 b 123 c	Enterprise Wide Risk Assessment  Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes Yes
123 e	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g 123 h	Suspicious Activity Filing Technology	Yes Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123 I	Other (specify)	123: the areas are generally covered within the multi-annual audit plan.
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy	
	and completeness?	Yes
125	Confirm that all responses provided in the above	V
	section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	and the brainings that the applies to.	
1		
126	If appropriate, provide any additional	122b: the Bank is audited by external third party based on demand
	information/context to the answers in this section.	,,
14. FRAU	D	
127	Does the Entity have policies in place addressing	Von
400	fraud risk?	Yes
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes
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## Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ) V1.4

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 а	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	
Declaration Statement		
<u>Declaration Statement</u>		
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)		
BANCA MONTE DEI PASCHI DI SIENA S.P.A. (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.		
The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.		
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.		
The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.		
The Financial Institution commits to file accurate supplemental information on a timely basis.		
I, Mr. GIOVANNI OSPITE (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.		
I, Mr. LEONARDO BELLUCCI (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.		
(Signature & Date)		
(Signature & Date)		