



Financial Institution Name:

Banca Monte dei Paschi di Siena S.p.A.

Location (Country) :

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 # | 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 by this questionnaire | All Italian branches and the foreign branch of Shanghai |
| 3 | Full Legal (Registered) Address | Piazza Salimbeni n.3, 53100 Siena, Italy. |
| 4 | Full Primary Business Address (if different from above) | |
| 5 | Date of Entity incorporation/ establishment | 25 August 1995 |
| 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 symbol | Borsa Italiana S.p.A. - MTA - Isin IT0005218752 |
| 6 b | Member Owned/ Mutual | No |
| 6 c | Government or State Owned by 25% or more | Yes |
| 6 d | Privately Owned | |
| 6 d1 | If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more | n.a. |
| 7 | % of the Entity's total shares composed of bearer shares | n.a. |
| 8 | Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ? | No |
| 8 a | If Y, provide the name of the relevant branch/es which operate under an OBL | |
| 9 | Name of primary financial regulator / supervisory authority | Banca d'Italia /BCE |

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| 10 | Provide Legal Entity Identifier (LEI) if available | J4CP7MHCXR8DAQMKIL78 |
| 11 | Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ) | |
| 12 | Jurisdiction of licensing authority and regulator of ultimate parent | |
| 13 | Select the business areas applicable to the Entity | |
| 13 a | Retail Banking | Yes |
| 13 b | Private Banking / Wealth Management | Yes |
| 13 c | Commercial Banking | Yes |
| 13 d | Transactional Banking | Yes |
| 13 e | Investment Banking | Yes |
| 13 f | Financial Markets Trading | Yes |
| 13 g | Securities Services / Custody | Yes |
| 13 h | Broker / Dealer | Yes |
| 13 i | Multilateral Development Bank | No |
| 13 j | Other | No |
| 14 | Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided.) | No |
| 14 a | If Y, provide the top five countries where the non-resident customers are located. | |
| 15 | Select the closest value: | |
| 15 a | Number of employees | 10001+ |
| 15 b | Total Assets | Greater than \$500 million |
| 16 | Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches | Yes |
| 16 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 16 b | 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. Ref. 6. https://www.gruppomps.it/en/corporate-governance/shareholding-structure.html |

| 2. PRODUCTS & SERVICES | | |
|------------------------|--|---|
| 17 | Does the Entity offer the following products and services: | |
| 17 a | Correspondent Banking | Yes |
| 17 a1 | If Y | |
| 17 a2 | Does the Entity offer Correspondent Banking services to domestic banks? | Yes |
| 17 a3 | Does the Entity allow domestic bank clients to provide downstream relationships? | No |
| 17 a4 | Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? | Yes |
| 17 a5 | Does the Entity offer correspondent banking services to Foreign Banks? | Yes |
| 17 a6 | Does the Entity allow downstream relationships with Foreign Banks? | Yes |
| 17 a7 | Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks? | Yes |
| 17 a8 | Does the Entity offer correspondent banking services to regulated MSBs/MVTS? | No |
| 17 a9 | Does the Entity allow downstream relationships with MSBs/MVTS? | No |
| 17 a10 | Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS? | No |
| 17 b | Private Banking (domestic & international) | Yes |
| 17 c | Trade Finance | Yes |
| 17 d | Payable Through Accounts | No |
| 17 e | Stored Value Instruments | Yes |
| 17 f | Cross Border Bulk Cash Delivery | No |
| 17 g | Domestic Bulk Cash Delivery | Yes |
| 17 h | International Cash Letter | No |
| 17 i | Remote Deposit Capture | Yes |
| 17 j | Virtual /Digital Currencies | No |
| 17 k | Low Price Securities | No |
| 17 l | Hold Mail | Yes |
| 17 m | Cross Border Remittances | Yes |
| 17 n | Service to walk-in customers (non-account holders) | Yes |
| 17 o | Sponsoring Private ATMs | No |
| 17 p | Other high risk products and services identified by the Entity | No |
| 18 | Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches | Yes |
| 18 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 18 b | If appropriate, provide any additional information / context to the answers in this section. | Ref 17a6 BMPS provides downstream relationships only to its local and foreign sub's. 17a10 BMPS refrains from entering into or continuing a business relationship with MSB dealing with high ML-FT risk countries. 17n: Walking cust. serv. are mainly tax payment and withdraw of checks and is subject to AMLDD |

| 3. AML, CTF & SANCTIONS PROGRAMME | | |
|-----------------------------------|---|--|
| 19 | Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: | |
| 19 a | Appointed Officer with sufficient experience/expertise | Yes |
| 19 b | Cash Reporting | Yes |
| 19 c | CDD | Yes |
| 19 d | EDD | Yes |
| 19 e | Beneficial Ownership | Yes |
| 19 f | Independent Testing | Yes |
| 19 g | Periodic Review | Yes |
| 19 h | Policies and Procedures | Yes |
| 19 i | Risk Assessment | Yes |
| 19 j | Sanctions | Yes |
| 19 k | PEP Screening | Yes |
| 19 l | Adverse Information Screening | Yes |
| 19 m | Suspicious Activity Reporting | Yes |
| 19 n | Training and Education | Yes |
| 19 o | Transaction Monitoring | Yes |
| 20 | How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? | 51+ |
| 21 | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? | Yes |
| 22 | Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme? | Quarterly/Every three months |
| 23 | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? | No |
| 23 a | If Y, provide further details | |
| 24 | Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches | Yes |
| 24 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 24 b | 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 Anti-Money Laundering is the Head of the Chief Risk Officer, who reports to the Board of Directors directly |

| 4. ANTI BRIBERY & CORRUPTION | | |
|------------------------------|--|--|
| 25 | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption? | Yes |
| 26 | Does the Entity have an enterprise wide programme that sets minimum ABC standards? | Yes |
| 27 | Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? | Yes |
| 28 | Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? | Yes |
| 29 | Is the Entity's ABC programme applicable to: | Both joint ventures and third parties acting on behalf of the Entity |
| 30 | Does the Entity have a global ABC policy that: | |
| 30 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 |
| 30 b | Includes enhanced requirements regarding interaction with public officials? | Yes |
| 30 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 |
| 31 | Does the Entity have controls in place to monitor the effectiveness of their ABC programme? | Yes |
| 32 | Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters? | Yes |
| 33 | Does the Entity perform an Enterprise Wide ABC risk assessment? | Yes |
| 33 a | If Y select the frequency | 18 Months |
| 34 | Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? | Yes |
| 35 | Does the Entity's ABC EWRA cover the inherent risk components detailed below: | |
| 35 a | Potential liability created by intermediaries and other third-party providers as appropriate | Yes |
| 35 b | Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries | Yes |
| 35 c | Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials | Yes |
| 35 d | Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions | Yes |
| 35 e | Changes in business activities that may materially increase the Entity's corruption risk | Yes |
| 36 | Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures? | Yes |

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| 37 | Does the Entity provide mandatory ABC training to: | |
| 37 a | Board and senior Committee Management | Yes |
| 37 b | 1st Line of Defence | Yes |
| 37 c | 2nd Line of Defence | Yes |
| 37 d | 3rd Line of Defence | Yes |
| 37 e | 3rd parties to which specific compliance activities subject to ABC risk have been outsourced | No |
| 37 f | Non-employed workers as appropriate (contractors/consultants) | No |
| 38 | Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities? | No |
| 39 | Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches | Yes |
| 39 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 39 b | If appropriate, provide any additional information / context to the answers in this section. | |

| 5. AML, CTF & SANCTIONS POLICIES & PROCEDURES | | |
|---|--|--|
| 40 | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: | |
| 40 a | Money laundering | Yes |
| 40 b | Terrorist financing | Yes |
| 40 c | Sanctions violations | Yes |
| 41 | Are the Entity's policies and procedures updated at least annually? | Yes |
| 42 | Are the Entity's policies and procedures gapped against/compared to: | |
| 42 a | US Standards | Yes |
| 42 a1 | If Y, does the Entity retain a record of the results? | Yes |
| 42 b | EU Standards | Yes |
| 42 b1 | If Y, does the Entity retain a record of the results? | Yes |
| 43 | Does the Entity have policies and procedures that: | |
| 43 a | Prohibit the opening and keeping of anonymous and fictitious named accounts | Yes |
| 43 b | Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs | Yes |
| 43 c | Prohibit dealing with other entities that provide banking services to unlicensed banks | Yes |
| 43 d | Prohibit accounts/relationships with shell banks | Yes |
| 43 e | Prohibit dealing with another entity that provides services to shell banks | No |
| 43 f | Prohibit opening and keeping of accounts for Section 311 designated entities | Yes |
| 43 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 |
| 43 h | Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates | Yes |
| 43 i | Define escalation processes for financial crime risk issues | Yes |
| 43 j | Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk | Yes |
| 43 k | Specify how potentially suspicious activity identified by employees is to be escalated and investigated | Yes |
| 43 l | Outline the processes regarding screening for sanctions, PEPs and negative media | Yes |
| 43 m | Outline the processes for the maintenance of internal "watchlists" | No |
| 44 | Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business? | Yes |
| 45 | Does the Entity have a record retention procedures that comply with applicable laws? | Yes |
| 45 a | If Y, what is the retention period? | 5 years or more |
| 46 | Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches | Yes |
| 46 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 46 b | If appropriate, provide any additional information / context to the answers in this section. | Ref. 43c 43e The Bank refrains dealing with entities which deal with shell or unlicensed banks. Ref. 43m: BMPS hasn't internal watchlists |

| 6. AML, CTF & SANCTIONS RISK ASSESSMENT | | |
|---|--|-----|
| 47 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: | |
| 47 a | Client | Yes |
| 47 b | Product | Yes |
| 47 c | Channel | Yes |
| 47 d | Geography | Yes |
| 48 | Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: | |
| 48 a | Transaction Monitoring | Yes |
| 48 b | Customer Due Diligence | Yes |
| 48 c | PEP Identification | Yes |
| 48 d | Transaction Screening | Yes |
| 48 e | Name Screening against Adverse Media & Negative News | Yes |
| 48 f | Training and Education | Yes |
| 48 g | Governance | Yes |
| 48 h | Management Information | Yes |
| 49 | Has the Entity's AML & CTF EWRA been completed in the last 12 months? | Yes |
| 49 a | If N, provide the date when the last AML & CTF EWRA was completed. | |
| 50 | Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: | |
| 50 a | Client | Yes |
| 50 b | Product | Yes |
| 50 c | Channel | Yes |
| 50 d | Geography | Yes |

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| 51 | Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | |
| 51 a | Customer Due Diligence | Yes |
| 51 b | Transaction Screening | Yes |
| 51 c | Name Screening | Yes |
| 51 d | List Management | Yes |
| 51 e | Training and Education | Yes |
| 51 f | Governance | Yes |
| 51 g | Management Information | Yes |
| 52 | Has the Entity's Sanctions EWRA been completed in the last 12 months? | Yes |
| 52 a | If N, provide the date when the last Sanctions EWRA was completed. | |
| 53 | Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches | Yes |
| 53 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 53 b | If appropriate, provide any additional information / context to the answers in this section. | Ref. 48e: BMPS procedures involve manual name screening against negative media and negative news during customer due diligence and periodic review |

| 7. KYC, CDD and EDD | | |
|---------------------|--|---|
| 54 | Does the Entity verify the identity of the customer? | Yes |
| 55 | Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days | Yes |
| 56 | Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: | |
| 56 a | Ownership structure | Yes |
| 56 b | Customer identification | Yes |
| 56 c | Expected activity | Yes |
| 56 d | Nature of business/employment | Yes |
| 56 e | Product usage | Yes |
| 56 f | Purpose and nature of relationship | Yes |
| 56 g | Source of funds | Yes |
| 56 h | Source of wealth | Yes |
| 57 | Are each of the following identified: | |
| 57 a | Ultimate beneficial ownership | Yes |
| 57 a1 | Are ultimate beneficial owners verified? | Yes |
| 57 b | Authorised signatories (where applicable) | Yes |
| 57 c | Key controllers | Yes |
| 57 d | Other relevant parties | Verification of the presence of investigations or negative news including any suspicious activity reports, presence in a blacklist also on related parties etc. |
| 58 | What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification ? | 25% |
| 59 | Does the due diligence process result in customers receiving a risk classification? | Yes |

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| 60 | If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: | |
| 60 a | Product Usage | Yes |
| 60 b | Geography | Yes |
| 60 c | Business Type/Industry | Yes |
| 60 d | Legal Entity type | Yes |
| 60 e | Adverse Information | Yes |
| 60 f | Other (specify) | Presence of other negative news, presence of Suspicious Activity Reports, presence in a blacklist or related to a blacklisted Person, PEP's classification. |
| 61 | Does the Entity have a risk based approach to screening customers for adverse media/negative news? | Yes |
| 62 | If Y, is this at: | |
| 62 a | Onboarding | Yes |
| 62 b | KYC renewal | Yes |
| 62 c | Trigger event | Yes |
| 63 | What is the method used by the Entity to screen for adverse media / negative news? | Manual |
| 64 | Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? | Yes |
| 65 | If Y, is this at: | |
| 65 a | Onboarding | Yes |
| 65 b | KYC renewal | Yes |
| 65 c | Trigger event | Yes |
| 66 | What is the method used by the Entity to screen PEPs? | Combination of automated and manual |
| 67 | Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? | Yes |
| 68 | Does the Entity have a process to review and update customer information based on: | |
| 68 a | KYC renewal | Yes |
| 68 b | Trigger event | Yes |
| 69 | Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews? | Yes |

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| 70 | 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? | |
| 70 a | Non-account customers | EDD on a risk based approach |
| 70 b | Non-resident customers | EDD on a risk based approach |
| 70 c | Shell banks | Prohibited |
| 70 d | MVTS/ MSB customers | EDD & restricted on a risk based approach |
| 70 e | PEPs | EDD on a risk based approach |
| 70 f | PEP Related | EDD on a risk based approach |
| 70 g | PEP Close Associate | EDD on a risk based approach |
| 70 h | Correspondent Banks | EDD on a risk based approach |
| 70 h1 | If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014? | Yes |
| 70 i | Arms, defense, military | EDD & restricted on a risk based approach |
| 70 j | Atomic power | EDD & restricted on a risk based approach |
| 70 k | Extractive industries | EDD on a risk based approach |
| 70 l | Precious metals and stones | EDD on a risk based approach |
| 70 m | Unregulated charities | EDD & restricted on a risk based approach |
| 70 n | Regulated charities | EDD on a risk based approach |
| 70 o | Red light business / Adult entertainment | EDD on a risk based approach |
| 70 p | Non-Government Organisations | EDD on a risk based approach |
| 70 q | Virtual currencies | EDD on a risk based approach |
| 70 r | Marijuana | EDD on a risk based approach |
| 70 s | Embassies/Consulates | EDD on a risk based approach |
| 70 t | Gambling | EDD & restricted on a risk based approach |
| 70 u | Payment Service Provider | EDD & restricted on a risk based approach |
| 70 v | Other (specify) | Trust companies EDD & Restricted on a Risk Based Approach. |
| 71 | If restricted, provide details of the restriction | Absence of mandatory Governmental authorizations, financial activities with high "AML-CFT" risk countries etc... |
| 72 | Does the Entity perform an additional control or quality review on clients subject to EDD? | Yes |
| 73 | Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches | Yes |
| 73 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to | |
| 73 b | If appropriate, provide any additional information / context to the answers in this section. | ref. 70 i establishes to deal with customers only if licenced by italian/EU gov to trade in these industries 70r: allowed by the bank to the extend it is handled by the client for not prohibited purposes (e.g. medical purpose) |

| 8. MONITORING & REPORTING | | |
|---------------------------|---|--|
| 74 | Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity? | Yes |
| 75 | What is the method used by the Entity to monitor transactions for suspicious activities? | Combination of automated and manual |
| 76 | If manual or combination selected, specify what type of transactions are monitored manually | The manual process is used only when alerts / investigations are identified directly by the branches. The branch operator enters the report in the procedure in order to allow the assessment by the branch manager and by the MLRO for the possible forwarding to the FIU |
| 77 | Does the Entity have regulatory requirements to report suspicious transactions? | Yes |
| 77 a | If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? | Yes |
| 78 | Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? | Yes |
| 79 | Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches | Yes |
| 79 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to | |
| 79 b | If appropriate, provide any additional information / context to the answers in this section. | |

| 9. PAYMENT TRANSPARENCY | | |
|-------------------------|---|---|
| 80 | Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? | Yes |
| 81 | Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: | |
| 81 a | FATF Recommendation 16 | Yes |
| 81 b | Local Regulations | Yes |
| 81 b1 | Specify the regulation | EU Directive 2015/847 - Italian Law Decree 231/2007 |
| 81 c | If N, explain | |
| 82 | Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? | Yes |
| 83 | Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages? | Yes |
| 84 | Does the Entity have controls to support the inclusion of required beneficiary information international payment messages? | Yes |
| 85 | Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches | Yes |
| 85 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 85 b | If appropriate, provide any additional information / context to the answers in this section. | |

| 10. SANCTIONS | | |
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| 86 | Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions? | Yes |
| 87 | 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 |
| 88 | 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 |
| 89 | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? | Yes |
| 90 | What is the method used by the Entity? | Combination of automated and manual |
| 91 | 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 |
| 92 | What is the method used by the Entity? | Combination of automated and manual |
| 93 | Select the Sanctions Lists used by the Entity in its sanctions screening processes: | |
| 93 a | Consolidated United Nations Security Council Sanctions List (UN) | Used for screening customers and beneficial owners and for filtering transactional data |
| 93 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 |
| 93 c | Office of Financial Sanctions Implementation HMT (OFSI) | Used for screening customers and beneficial owners and for filtering transactional data |
| 93 d | European Union Consolidated List (EU) | Used for screening customers and beneficial owners and for filtering transactional data |
| 93 e | Lists maintained by other G7 member countries | Not used |
| 93 f | Other (specify) | Locally applicable lists in each jurisdiction if foreseen by local legislation. The Bank uses also World Check list |
| 94 | Question removed | |
| 95 | 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: | |
| 95 a | Customer Data | Same day to 2 business days |
| 95 b | Transactions | Same day to 2 business days |

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| 96 | Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions? | Yes |
| 97 | Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches | Yes |
| 97 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 97 b | If appropriate, provide any additional information / context to the answers in this section. | Representative office of Moscow (Russian Federation). |

| 11. TRAINING & EDUCATION | | |
|--------------------------|---|--|
| 98 | Does the Entity provide mandatory training, which includes : | |
| 98 a | Identification and reporting of transactions to government authorities | Yes |
| 98 b | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered | Yes |
| 98 c | Internal policies for controlling money laundering, terrorist financing and sanctions violations | Yes |
| 98 d | New issues that occur in the market, e.g., significant regulatory actions or new regulations | Yes |
| 98 e | Conduct and Culture | Yes |
| 99 | Is the above mandatory training provided to : | |
| 99 a | Board and Senior Committee Management | Yes |
| 99 b | 1st Line of Defence | Yes |
| 99 c | 2nd Line of Defence | Yes |
| 99 d | 3rd Line of Defence | Yes |
| 99 e | 3rd parties to which specific FCC activities have been outsourced | Not Applicable |
| 99 f | Non-employed workers (contractors/consultants) | Yes |
| 100 | Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities? | Yes |
| 101 | Does the Entity provide customised training for AML, CTF and Sanctions staff? | Yes |
| 102 | Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches | Yes |
| 102 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 102 b | 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. |

| 12. QUALITY ASSURANCE /COMPLIANCE TESTING | | |
|--|---|-----|
| 103 | Are the Entity's KYC processes and documents subject to quality assurance testing? | Yes |
| 104 | Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)? | Yes |
| 105 | Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches | Yes |
| 105 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 105 b | If appropriate, provide any additional information / context to the answers in this section. | |

| 13. AUDIT | | |
|-----------|---|---|
| 106 | In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF and Sanctions policies and practices on a regular basis? | Yes |
| 107 | How often is the Entity audited on its AML, CTF & Sanctions programme by the following: | |
| 107 a | Internal Audit Department | Yearly |
| 107 b | External Third Party | Component based reviews |
| 108 | Does the internal audit function or other independent third party cover the following areas: | |
| 108 a | AML, CTF & Sanctions policy and procedures | Yes |
| 108 b | KYC / CDD / EDD and underlying methodologies | Yes |
| 108 c | Transaction Monitoring | Yes |
| 108 d | Transaction Screening including for sanctions | Yes |
| 108 e | Name Screening & List Management | Yes |
| 108 f | Training & Education | Yes |
| 108 g | Technology | Yes |
| 108 h | Governance | Yes |
| 108 i | Reporting/Metrics & Management Information | Yes |
| 108 j | Suspicious Activity Filing | Yes |
| 108 k | Enterprise Wide Risk Assessment | Yes |
| 108 l | Other (specify) | |
| 109 | Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? | Yes |
| 110 | Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches | Yes |
| 110 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 110 b | If appropriate, provide any additional information / context to the answers in this section. | ref.. 107b: the Bank is audited by external third party based on demand |

