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



Financial Institution: Scotiabank Inverlat S.A. Institucion de Banca Multiple, Grupo Financiero Scotiabank Inverlat

Location (Country): Mexico

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 | Scotiabank Inverlat S.A. Institucion de Banca Multiple Grupo Financiero Scotiabank Inverlat |
| 2 | Append a list of foreign branches which are covered by this questionnaire | This questionnaire covers all branches in Mexico. |
| 3 | Full Legal (Registered) Address | Calle Lorenzo Boturini 202 Col. Transito Codigo Postal 06820 Mexico D.F. Delegacion Cuauhtemoc |
| 4 | Full Primary Business Address (if different from above) | Boulevard Manuel Avila Camacho num. 1, Colonia Lomas de Chapultepec, Delegacion Miguel Hidalgo, C.P. 11009, Mexico, Mexico City |
| 5 | Date of Entity incorporation/establishment | January 30th 1934 |
| 6 | Select type of ownership and append an ownership chart if available | |
| 6 a | Publicly Traded (25% of shares publicly traded) | No |
| 6 a1 | If Y, indicate the exchange traded on and ticker symbol | |
| 6 b | Member Owned/Mutual | No |
| 6 c | Government or State Owned by 25% or more | No |
| 6 d | Privately Owned | Yes |
| 6 d1 | If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more | The Bank of Nova Scotia through Grupo Financerio Scotiabank Inverlat, S.A. owns 99.9999% of Scotiabank Inverlat S.A. The Bank of Nova Scotia is a publicly traded company. |
| 7 | % of the Entity's total shares composed of bearer shares | 0% - Bearer shares are prohibited. |
| 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 | Does the Bank have a Virtual Bank License or provide services only through online channels? | No |
| 10 | Name of primary financial regulator/supervisory authority | Secretaría de Hacienda y Crédito Público-SHCP (Ministry of Finance and Public Credit) Banco de México (Central Bank of México) Supervisor - Comisión Nacional Bancaria y de Valores-CNBV (National Banking and Securrities Commission). |
| 11 | Provide Legal Entity Identifier (LEI) if available | 549300T60BY4RTBQCL56 |
| 12 | Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ) | The Bank of Nova Scotia |

| 13 | Jurisdiction of licensing authority and regulator of ultimate | Canada - Office of the Superintendent of Financial Institutions (OSFI) |
|----------|---|---|
| | parent | Canada - Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) |
| 14 | Select the business areas applicable to the Entity | |
| 14 a | Retail Banking | Yes |
| 14 b | 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 | No No |
| 14 g | Broker/Dealer | No No |
| 14 ii | Multilateral Development Bank | No No |
| | | |
| 14 j | Wealth Management | Yes |
| 14 k | Other (please explain) | |
| 15 | Does the Entity have a significant (10% or more) portfolio of | |
| | non-resident customers or does it derive more than 10% of its | |
| | revenue from non-resident customers? (Non- resident means | No |
| | customers primarily resident in a different jurisdiction to the | |
| | location where bank services | |
| | are provided) | |
| 15 a | If Y, provide the top five countries where the non- resident | |
| | customers are located. | |
| 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. | Yes |
| 17 a | If N, clarify which questions the difference/s relate to and | |
| | the branch/es that this applies to. | |
| 18 | If appropriate, provide any additional information/context to | |
| | the answers in this section. | |
| | | |
| 2 DDODI | JCTS & SERVICES | |
| | | |
| 19 | Does the Entity offer the following products and services: | |
| 19 a | Correspondent Banking | Yes |
| 19 a1 | If Y | |
| 19 a1a | Does the Entity offer Correspondent Banking | Yes |
| | services to domestic banks? | 1.00 |
| 19 a1b | Does the Entity allow domestic bank clients to | No |
| | provide downstream relationships? | 10 |
| 19 a1c | Does the Entity have processes and procedures in | |
| | place to identify downstream relationships with | Yes |
| | domestic banks? | |
| 19 a1d | Does the Entity offer Correspondent Banking | Van |
| L | services to foreign banks? | Yes |
| 19 a1e | Does the Entity allow downstream relationships with | No |
| L | foreign banks? | INO |
| 19 a1f | Does the Entity have processes and procedures in | |
| | place to identify downstream relationships with foreign | Yes |
| 19 a1g | Does the Entity offer Correspondent Banking services | |
| | to regulated Money Services Businesses | No |
| | (MSBs)/Money Value Transfer Services (MVTSs)? | |
| 19 a1h | Does the Entity allow downstream relationships with | |
| | MSBs, MVTSs, or Payment Service Provider (PSPs)? | |
| 19 a1h1 | MSBs | No |
| 19 a1h2 | MVTSs | No |
| 19 a1h3 | PSPs | No |
| .5 41110 | . 5/ 0 | P 17 |

| 19 a1i | Does the Entity have processes and procedures in | |
|---------|--|--|
| | place to identify downstream relationships with | Yes |
| | MSBs /MVTSs/PSPs? | |
| 19 b | Cross-Border Bulk Cash Delivery | No No |
| 19 c | Cross-Border Remittances | Yes |
| 19 d | | No No |
| 19 e | | No No |
| 19 f | International Cash Letter | Yes |
| 19 g | | No No |
| 19 h | | No . |
| 19 i | Payment services to non-bank entities who may then offer | |
| 191 | third party payment services to their customers? | No |
| 19 i1 | If Y, please select all that apply below? | |
| 19 i2 | Third Party Payment Service Providers | |
| 19 i3 | Virtual Asset Service Providers (VASPs) | |
| | | |
| 19 i4 | eCommerce Platforms | |
| 19 i5 | Other - Please explain | |
| 19 j | Private Banking | Yes |
| 19 k | Remote Deposit Capture (RDC) | No No |
| 19 I | Sponsoring Private ATMs | No |
| 19 m | | No |
| 19 n | Trade Finance | Yes |
| 19 o | | 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 | | No No |
| 19 p1a | If yes, state the applicable level of due diligence | |
| 19 p2 | | No |
| 19 p2a | If yes, state the applicable level of due diligence | |
| 19 p3 | | No |
| 19 p3a | If yes, state the applicable level of due diligence | |
| 19 p3a | | No No |
| 19 p4a | If yes, state the applicable level of due diligence | |
| 19 p4a | If you offer other services to walk-in customers please | |
| 19 p3 | | N/A |
| | of due diligence. | IWA |
| 19 q | Other high-risk products and services identified by the | |
| 19 4 | Entity (please specify) | |
| 20 | Confirm that all responses provided in the above Section | |
| 20 | are representative of all the LE's branches. | Yes |
| 20 a | If N, clarify which questions the difference/s relate to and | |
| 20 a | the branch/es that this applies to. | |
| 21 | | In regard to question 19c we interpret remittance to include international wire transfers or EFTs. However, we do not provide services for |
| - ' | the answers in this section. | In regard to question 19c we interpret remittance to include international wire transfers or EFTs. However, we do not provide services for the transfer of money by foreign workers back to their country of origin. |
| 3 AMI C | TF & SANCTIONS PROGRAMME | |
| , , | | |
| 22 | Does the Entity have a programme that sets minimum | |
| | AML, CTF and Sanctions standards regarding the following | |
| 00 - | components: | v. |
| 22 a | Appointed Officer with sufficient experience/expertise | Yes |
| 22 b | Adverse Information Screening | Yes |
| 22 c | Beneficial Ownership | Yes |
| 22 d | Cash Reporting | Yes |
| 22 e | CDD | Yes |
| 22 f | EDD | Yes |
| 22 g | Independent Testing | Yes |
| 22 h | Periodic Review | Yes |
| 22 i | Policies and Procedures | Yes |
| 22 j | PEP Screening | Yes |
| 22 k | Risk Assessment | Yes |
| 22 K | Sanctions | Yes |
| 44 1 | Ganduolis | 100 |
| | | |

| | _ | |
|-----------|--|---|
| 22 m | Suspicious Activity Reporting | Yes |
| 22 n | Training and Education | Yes |
| 22 o | Transaction Monitoring | Yes |
| 23 | How many full time employees are in the Entity's AML, 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 | Yes |
| | Committee? If N, describe your practice in | |
| | Question 29. | |
| 25 | Does the Board receive, assess, and challenge regular | |
| | reporting on the status of the AML, CTF, & Sanctions programme? | Yes |
| 26 | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? | Yes |
| 26 a | If Y, provide further details | The entity may use third parties, including other Bank of Nova Scotia subsidiaries and/or affiliates, to perform certain AML functions on its behalf in accordance with its AML standards, subject to local regulations. The entity maintains controls and oversight over the third party arrangement and remains ultimately accountable for the actions of the third party per the terms of any relevant agreement(s). |
| 27 | Does the entity have a whistleblower policy? | Yes |
| 28 | Confirm that all responses provided in the above Section are representative of all the LE's branches | Yes |
| 28 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 29 | If appropriate, provide any additional information/context to | |
| | the answers in this section. | |
| 4. ANTI B | RIBERY & CORRUPTION | |
| 30 | Has the Entity documented policies and procedures | |
| | consistent with applicable ABC regulations and requirements | Yes |
| | to reasonably prevent, detect and report | Yes |
| | bribery and corruption? | |
| 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 | Yes |
| | coordinating the ABC programme? | |
| 33 | Does the Entity have adequate staff with appropriate levels of | Yes |
| | experience/expertise to implement the ABC programme? | |
| 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 | Yes |
| | intended to influence action or obtain an | |
| 0.5.1 | advantage | |
| 35 b | Includes enhanced requirements regarding interaction with public officials? | Yes |
| 35 с | Includes a prohibition against the falsification of books and | |
| | records (this may be within the ABC policy or any other | Yes |
| | policy applicable to the Legal Entity)? | |
| 36 | Does the Entity have controls in place to monitor the effectiveness of their ABC programme? | Yes |
| 37 | Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? | Yes |
| 38 | Has the Entity's ABC Enterprise Wide Risk Assessment | |
| 33 | (EWRA) been completed in the last 12 months? | Yes |
| 38 a | If N, provide the date when the last ABC EWRA was | |
| 39 | completed. Does the Entity have an ABC residual risk rating that is the | |
| 39 | | Yes |
| | net result of the controls effectiveness and the | Tes . |
| 40 | inherent risk assessment? | |
| 40 | Does the Entity's ABC EWRA cover the inherent risk components detailed below: | |
| 40 a | Potential liability created by intermediaries and other third- | Yes |
| | party providers as appropriate | 1277 |
| | | |

| 40 b | Corruption risks associated with the countries and | |
|--------------------------------------|--|--|
| l | industries in which the Entity does business, directly or | Yes |
| | through intermediaries | |
| 40 c | Transactions, products or services, including those that | |
| l | involve state-owned or state-controlled entities or | Yes |
| <u> </u> | public officials | |
| 40 d | Corruption risks associated with gifts and hospitality, | |
| l | hiring/internships, charitable donations and political | Yes |
| | contributions | |
| 40 e | Changes in business activities that may materially | Yes |
| | increase the Entity's corruption risk | |
| 41 | Does the Entity's internal audit function or other independent | |
| l | third party cover ABC Policies and | Yes |
| | Procedures? | |
| 42 | Does the Entity provide mandatory ABC training to: | |
| 42 a | Board and senior Committee Management | Yes |
| 42 b | 1st Line of Defence | Yes |
| 42 c | 2nd Line of Defence | Yes |
| 42 d | 3rd Line of Defence | Yes |
| 42 e | Third parties to which specific compliance activities | Yes |
| | subject to ABC risk have been outsourced | |
| 42 f | Non-employed workers as appropriate | Yes |
| | (contractors/consultants) | |
| 43 | Does the Entity provide ABC training that is targeted to | Yes |
| 44 | specific roles, responsibilities and activities? | |
| 44 | Confirm that all responses provided in the above Section are | Yes |
| 44 - | representative of all the LE's branches | Tes . |
| 44 a | If N, clarify which questions the difference/s relate to and | N/A |
| 45 | the branch/es that this applies to. If appropriate, provide any additional information/context to | TWO |
| 40 | the answers in this section. | The entity is subject to Enterprise Wide Anti-Bribery & Corruption Program of its Parent Company The Bank of Nova Scotia. All aspects of |
| l | uie answers in this section. | the EWABC program have been implemented in the entity's operations. In reference to Q42e, while mandatory training is not provided by |
| | <u> </u> | ourselves, we do ensure that 3rd parties have either satisfactory training in place or the appropriate policies and controls. |
| | CTF & SANCTIONS POLICIES & PROCEDURES | |
| 46 | Has the Entity documented policies and procedures | |
| l | 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 | Yes |
| | annually? | |
| 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 | Van |
| | fictitious named accounts | Yes |
| 40.1 | | |
| 49 b | Prohibit the opening and keeping of accounts for | Voc |
| 49 b | Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs | Yes |
| 49 b 49 c | | |
| 49 c | unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks | Yes |
| 49 c 49 d | unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks | |
| 49 c | unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks | Yes Yes |
| 49 c 49 d 49 e | unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks | Yes |
| 49 c 49 d | unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section | Yes Yes |
| 49 c 49 d 49 e | unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities | Yes Yes |
| 49 c 49 d 49 e | unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of | Yes Yes |
| 49 c 49 d 49 e | unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges | Yes Yes Yes Yes |
| 49 c 49 d 49 e | unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money | Yes Yes |
| 49 c 49 d 49 e 49 f 49 g | unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities 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 Yes Yes Yes |
| 49 c 49 d 49 e | unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities 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 Assess the risks of relationships with domestic and foreign | Yes Yes Yes Yes |
| 49 c 49 d 49 e 49 f 49 g | unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities 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 Yes Yes Yes |

| 49 i | Define the process for escalating financial crime risk | |
|--|--|---|
| | issues/potentially suspicious activity identified by | Yes |
| | employees | |
| 49 j | Define the process, where appropriate, for terminating | |
| · · · , | existing customer relationships due to | Yes |
| | financial crime risk | |
| 49 k | Define the process for exiting clients for financial crime | |
| 49 K | reasons that applies across the entity, including foreign | Yes |
| | | Yes |
| | branches and affiliates | |
| 49 I | Define the process and controls to identify and handle | |
| | customers that were previously exited for financial crime | Yes |
| | reasons if they seek to re-establish a | |
| | relationship | |
| 49 m | Outline the processes regarding screening for sanctions, | Yes |
| | PEPs and Adverse Media/Negative News | 165 |
| 49 n | Outline the processes for the maintenance of internal | L. |
| | "watchlists" | Yes |
| 50 | Has the Entity defined a risk tolerance statement or similar | |
| ا | document which defines a risk boundary around | Yes |
| | their business? | |
| 51 | Does the Entity have record retention procedures that | |
| " | comply with applicable laws? | Yes |
| E4 - | | |
| 51 a | If Y, what is the retention period? | 5 years or more |
| 52 | Confirm that all responses provided in the above Section | lv |
| | 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. | N/A |
| 6. AML, C | TF & SANCTIONS RISK ASSESSMENT | |
| | | |
| 54 | Does the Entity's AML & CTF EWRA cover the inherent | |
| 54 | | |
| | risk components detailed below: | Yes |
| 54 a | risk components detailed below: Client | Yes Yes |
| 54 a 54 b | risk components detailed below: Client Product | Yes |
| 54 a 54 b 54 c | risk components detailed below: Client Product Channel | Yes Yes |
| 54 a 54 b 54 c 54 d | risk components detailed below: Client Product Channel Geography | Yes |
| 54 a 54 b 54 c | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls | Yes Yes |
| 54 a 54 b 54 c 54 d 55 | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: | Yes Yes Yes |
| 54 a 54 b 54 c 54 d 55 | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring | Yes Yes Yes Yes Yes |
| 54 a 54 b 54 c 54 d 55 55 a 55 b | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence | Yes Yes Yes Yes Yes Yes |
| 54 a 54 b 54 c 54 d 55 55 55 a 55 b 55 c | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification | Yes Yes Yes Yes Yes Yes Yes |
| 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening | Yes |
| 54 a 54 b 54 c 54 d 55 55 55 a 55 b 55 c | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News | Yes Yes Yes Yes Yes Yes Yes |
| 54 a 54 b 54 c 54 d 55 55 55 a 55 b 55 c 55 d | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News | Yes |
| 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening | Yes |
| 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 c | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance | Yes |
| 54 a 54 b 54 c 55 d 55 b 55 c 55 c 55 f 55 g 55 h | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information | Yes |
| 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 c | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in | Yes |
| 54 a 554 b 554 c 554 d 555 b 555 c 555 f 555 g 555 h 566 | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? | Yes |
| 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 c 55 c 55 c 55 f 55 g 55 h | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA | Yes |
| 54 a 54 b 55 d c 54 d 55 5 c 55 d 55 c 55 d 55 f 55 e 55 f 55 g 55 h 56 a | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. | Yes |
| 54 a 554 b 554 c 554 d 555 b 555 c 555 f 555 g 555 h 566 | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent | Yes |
| 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 c 55 f 55 g 55 h 56 a 57 | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: | Yes |
| 54 a 54 b 55 d c 54 d 55 5 c 55 d 55 c 55 d 55 f 55 g 55 h 56 56 a | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent | Yes |
| 54 a 54 b 55 d c 54 d 55 b 55 c 55 d 55 d 55 d 55 d 55 d 55 | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: | Yes |
| 54 a 54 b 55 d c 54 d 55 b 55 c 55 d 55 f 55 g 55 h 56 a 57 57 a 57 b | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product | Yes |
| 54 a 54 b 55 c 55 a 55 b 55 c 55 d 55 g 55 h 56 a 57 a 57 b 57 c | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel | Yes |
| 54 a 54 b 55 d c 54 d 55 b 55 c 55 f 55 g 55 h 56 a 57 b 57 a 57 b 57 c 57 d 57 d | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography | Yes |
| 54 a 54 b 55 c 55 a 55 b 55 c 55 d 55 g 55 h 56 a 57 a 57 b 57 c | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls | Yes |
| 54 a | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | Yes |
| 54 a 554 b 554 c 554 d 555 c 555 c 555 c 555 f 55 g 55 h 56 a 57 c 57 d 57 c 57 d 58 a 58 a 58 a 58 d 58 d 58 d 58 d 58 | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence | Yes |
| 54 a 554 b 554 c 554 d 555 c 555 c 555 f 55 g 55 h 56 a 57 b 57 c 57 d 58 b 58 a 58 b | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance | Yes |
| 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 d 55 6 5 6 6 55 f 55 g 55 h 56 a 57 b 57 d 57 b 57 d 58 a 58 b 58 c | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance List Management | Yes |
| 54 a 554 b 554 c 554 d 555 c 555 c 555 f 55 g 55 h 56 a 57 b 57 c 57 d 58 b 58 a 58 b | risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance | Yes |

| 58 e | Name Screening | Yes |
|---------------|---|--|
| 58 f | Transaction Screening | Yes |
| 58 g | Training and Education | Yes |
| 59 | Has the Entity's Sanctions EWRA been completed in the | Yes |
| | last 12 months? | Yes |
| 59 a | If N, provide the date when the last Sanctions EWRA was | |
| | completed. | |
| 60 | Confirm that all responses provided in the above Section are | |
| | representative of all the LE's branches | Yes |
| 60 a | If N, clarify which questions the difference/s relate to and | |
| | the branch/es that this applies to. | |
| 61 | If appropriate, provide any additional information/context to | |
| | the answers in this section. | |
| 7. KYC, C | DD and EDD | |
| 62 | Does the Entity verify the identity of the customer? | Yes |
| 63 | Do the Entity's policies and procedures set out when | |
| | CDD must be completed, e.g. at the time of onboarding or | Yes |
| | within 30 days? | |
| 64 | Which of the following does the Entity gather and retain when | |
| | conducting CDD? Select all that apply: | |
| 64 a | Customer identification | Yes |
| 64 b | Expected activity | Yes |
| 64 c | Nature of business/employment | Yes |
| 64 d | Ownership structure | Yes |
| 64 e | Product usage | Yes |
| 64 f | Purpose and nature of relationship | Yes |
| 64 g | Source of funds | Yes |
| 64 h | Source of wealth | Yes |
| 65 | Are each of the following identified: | |
| 65 a | Ultimate beneficial ownership | Yes |
| 65 a1 65 b | Are ultimate beneficial owners verified? Authorised signatories (where applicable) | Yes Yes |
| 65 C | | Yes |
| 65 d | Key controllers Other relevant parties | Yes |
| 66 | What is the Entity's minimum (lowest) threshold applied | Tes . |
| 00 | to beneficial ownership identification? | 25% |
| 67 | Does the due diligence process result in customers | |
| 07 | receiving a risk classification? | Yes |
| 67 a | If Y, what factors/criteria are used to determine the | |
| 0, u | 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) | Transactional activity, PEP connections, Sanction Exposure |
| 68 | For high risk non-individual customers, is a site visit a | Yes |
| | part of your KYC process? | 160 |
| 68 a | If Y, is this at: | |
| 68 a1 | Onboarding | Yes |
| 68 a2 | KYC renewal | Yes |
| 68 a3 | riigger event | No No |
| 68 a4 | 0.1101 | No . |
| 68 a4a | If yes, please specify "Other" | |
| 69 | Does the Entity have a risk based approach to screening | Yes |
| 69 a | customers for Adverse Media/Negative News? If Y, is this at: | |
| 69 a 69 a1 | If Y, is this at: Onboarding | Yes |
| 69 a1 | KYC renewal | Yes |
| 09 aZ | NTO TEHEWAI | 100 |
| | | |

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

| | | Ta |
|----------|--|--|
| 78 a | If Y indicate who provides the approval: | Senior business manager |
| 79 | Does the Entity have specific procedures for onboarding | |
| | entities that handle client money such as lawyers, | No No |
| | accountants, consultants, real estate agents? | |
| 80 | Does the Entity perform an additional control or quality | Yes |
| | review on clients subject to EDD? | ies |
| 81 | Confirm that all responses provided in the above Section | |
| | are representative of all the LE's branches | Yes |
| 81 a | If N, clarify which questions the difference/s relate to and | |
| | the branch/es that this applies to | |
| 82 | If appropriate, provide any additional information/context to | With regards to question 64h, the gathering of Source of Wealth is obtained for all Wealth segment clients and when EDD is required. |
| | the answers in this section. | Q76a response - the services as a customer is only allowed for Mexican Secretary of Defense and Mexican Navy. |
| 8. MONIT | ORING & REPORTING | |
| 83 | Does the Entity have risk based policies, procedures and | |
| 03 | monitoring processes for the identification and reporting of | Yes |
| | suspicious activity? | ies |
| 0.4 | What is the method used by the Entity to monitor | |
| 84 | | Combination of automated and manual |
| 04 - | transactions for suspicious activities? | Manual monitoring is appropriate where transactions involve heightened risks that warrant overlapping controls. Some or all of the risks and |
| 84 a | If manual or combination selected, specify what type of | Imanual monitoring is appropriate where transactions involve neightened risks that warrant overlapping controls. Some or all of the risks and red flags for which the transactions are being monitored are not easily identified by automated monitoring. All transactions are monitored |
| | transactions are monitored manually | using a risk based approach. |
| 84 b | If automated or combination selected, are internal system | |
| | or vendor-sourced tools used? | Vendor-sourced tools |
| 84 b1 | If 'Vendor-sourced tool' or 'Both' selected, what is the | |
| | name of the vendor/tool? | Fortent |
| 84 b2 | When was the tool last updated? | 1-2 years |
| 84 b3 | When was the automated Transaction Monitoring | . 2 yours |
| 04 03 | application last calibrated? | 1-2 years |
| 85 | Does the Entity have regulatory requirements to report | |
| 03 | suspicious transactions? | Yes |
| 85 a | If Y, does the Entity have policies, procedures and | |
| 00 a | processes to comply with suspicious transaction | Yes |
| | | ies |
| 00 | reporting requirements? | |
| 86 | Does the Entity have policies, procedures and processes to | L |
| | review and escalate matters arising from the monitoring of | Yes |
| | customer transactions and activity? | |
| 87 | Does the Entity have a data quality management | |
| | programme to ensure that complete data for all transactions | Yes |
| | are subject to monitoring? | |
| 88 | Does the Entity have processes in place to respond to | |
| | Request For Information (RFIs) from other entities in a | Yes |
| | timely manner? | |
| 89 | Does the Entity have processes in place to send | |
| | Requests for Information (RFIs) to their customers in a timely | Yes |
| | manner? | |
| 90 | Confirm that all responses provided in the above Section are | |
| | representative of all the LE's branches | Yes |
| 90 a | If N, clarify which questions the difference/s relate to and | |
| | the branch/es that this applies to | |
| 91 | If appropriate, provide any additional information/context to | |
| | the answers in this section. | |
| 9. PAYM | ENT TRANSPARENCY | |
| | | |
| 92 | Does the Entity adhere to the Wolfsberg Group Payment | Yes |
| | Transparency Standards? | |

| 93 | Does the Entity have policies, procedures and processes to | |
|-----------|--|---|
| | comply with and have controls in place to | |
| | ensure compliance with: | |
| 93 a | FATF Recommendation 16 | Yes |
| 93 b | Local Regulations | Yes |
| 93 b1 | If Y, specify the regulation | Article 115 of the Credit Institutions Law (LIC) and AML General Provisions referred to article 115 of the LIC. |
| 93 с | If N, explain | |
| 94 | Does the Entity have controls to support the inclusion of | |
| | required and accurate originator information in cross | Yes |
| | border payment messages? | |
| | Does the Entity have controls to support the inclusion of | |
| | required beneficiary information cross-border payment | Yes |
| | messages? | |
| 95 a | If Y, does the Entity have procedures to include | Yes |
| | beneficiary address including country in cross border | 1.00 |
| | 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. | |
| | If appropriate, provide any additional information/context to | |
| 10. SANCT | the answers in this section. | |
| | | |
| | Does the Entity have a Sanctions Policy approved by | |
| | management regarding compliance with sanctions law | |
| | applicable to the Entity, including with respect to its business | Yes |
| | conducted with, or through accounts held at foreign financial | |
| | institutions? | |
| | 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 | Yes |
| | violate sanctions prohibitions applicable to the other entity | |
| | (including prohibitions within | |
| | the other entity's local jurisdiction)? Does the Entity have policies, procedures or other controls | |
| | reasonably designed to prohibit and/or detect actions taken | |
| | | Yes |
| | or the resubmission and/or masking, of sanctions relevant | Tes |
| | information in cross border transactions? | |
| | Does the Entity screen its customers, including beneficial | |
| - | ownership information collected by the Entity, during | |
| | onboarding and regularly thereafter against Sanctions | Yes |
| | Lists? | |
| | 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 | ACDIA |
| | is the name of the vendor/tool? | ACRM |
| 102 a2 | When did you last test the effectiveness (of finding true | |
| | matches) and completeness (lack of missing data) of | <1 year |
| | the matching configuration of the automated tool? (If | N year |
| | 'Other' please explain in | |
| | Does the Entity screen all sanctions relevant data, including | |
| | at a minimum, entity and location information, contained in | Yes |
| | cross border transactions against Sanctions | 1100 |
| | Lists? | |
| 104 | What is the method used by the Entity? | Automated |

| Does the Entity have a data quality management programme to the service that complete data for all transactions are subject to sanctions serviced by the Entity in the Institute of Selection and Subject to Selection and Selectio | | | |
|--|-----------|---|---|
| to ensure that complete data for all transactions are subject to anactions screening? Select the Sanctions Lists used by the Entity in its sentions aretering processes. 106 a Consolidated United Watron Security Council Used for screening customers and beneficial owners and for littening transactional data. 106 b United States Department of the Treasury's Office of Foreign Assets Central (OFAC) 106 c Office of Financial Sanctions Implementation HMT (OFSI) 106 c Office of Financial Sanctions Implementation HMT (OFSI) 106 c Lists mentional by other processes and some and for littening transactional data. 106 c Lists mentional by other Government and beneficial owners and for littening transactional data. 107 b Control Pata Sanctions Implementation HMT (OFSI) 108 c Lists mentional by other Government and beneficial owners and for littening transactional data. 107 a Customer Data Sanctions of the Sanctions and Sanctions S | 105 | Does the Entity have a data quality management programme | |
| transactions are subsect to sanctions screening? 106 Select the Sanctions Lists used by the Enrily in its sanctions screening processes: 106 a Consolidated Unled Nation's Society Council Sanctions Les UNI 106 b Selection Select UNI 107 b Selection Sel | | | Yes |
| Select the Sanctions Lists used by the Entity in its sender screening processes: | | | |
| sanctions screening processes: 166 a | 106 | | |
| Description List (United States Department of the Treasury's Office of Foreign Assets Control (OFAC) | 100 | | |
| Sanctions List (UN) 106 b United States Department of the Treasury's Office of Foreign Assets Control (GFAC) 106 c Office of Financial States Control (GFAC) 106 c Office of Financial States Control (GFAC) 106 c User of Financial States Control (GFAC) 106 c User of Financial States Control (GFAC) 106 c User of Financial States (GFAC) 106 c User of Financial States (GFAC) 107 c User (specify) 108 c User instituted by the Control of Financial States (GFAC) 109 c User (specify) 100 c User (spec | 106.0 | | |
| 106 b United States Department of the Treasury's Office of Forein Assets Control (OPAC) Dead for screening outcomers and beneficial owners and for filtering transactional data | 100 a | | Used for screening customers and beneficial owners and for filtering transactional data |
| Foreign Assets Control (OFAC) 6 C Office of Financial Stanctions Implementation HMT (OFSI) 106 d European Union Consolidated List (EU) 106 b User for severing outcomes and beneficial cowers and for litering transactional data 106 d Other (specify) 107 When regulatory authorities make updates to their Sanctions isst, how many business days before the entity updates their sanctions isst, how many business days before the entity updates their sanctions isst, how many business days before the entity updates their sanctions isst, how many business days before the entity updates their sanctions isst, how many business days before the entity updates their sanctions isst, how many business days before the entity updates their sanctions isst, how many business days before the entity updates their sanctions is the many sanctional data. 107 a Continent Data 108 Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/epions against which UN, OFAC, OFSI, EU or G7 nomember countries have enacted comprehensive jurisdiction-based Sanctions? 109 Confirm that all responses provided in the above Section are representative of all the LEs branches to and the LEs branches in their sapples to and the branche's the lith sapiles to and the provide any additional representative of all the LEs branches to and the provide any additional representative of all the LEs branches to and the last sapiles to and the provide any additional representative of all the LEs branches to and the last sapiles to and the provide and any additional representation of all the LEs branches to and the last sapiles to and the provide and any additional representation of all the LEs branches and the last sapiles to an additional representation of all the LEs branches an | 400 h | | |
| 106 c Office of Financial Sanctions implementation HMT (OFS) Used for consening custemers and sherelical owners and of filtering anneactional data | 100 D | | Used for screening customers and beneficial owners and for filtering transactional data |
| 106 European Union Consolidated List (EU) Used for scenering customers and beneficial coveres and for filtering transactional data | | | |
| Uses maintained by other G7 member countries Used for screening customers and beneficial owners and for filtering transactional data | | | |
| 107 When regulatory submorities 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 days before the entity updates their active manual and/or automated screening systems against: 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? 109 a If It, darify which questions the difference's relate to and the branches that this applies to. 110 Internal policies and additional information/context to the answers in this sequestion. 111 Tables the Entity provide mandatory training, which includes: 112 Captain and a sequential control of the comprehensive office of products and services offered 111 Captain and a sequential control of the comprehensive office of products and services offered 111 Captain and the comprehensive office of the comprehensive of the comprehe | | | |
| When regulatory authorities make updates to their Sanctions Ist, how many business days before the entity updates their active manual and/or automated screening systems against: 107 a | | | Used for screening customers and beneficial owners and for filtering transactional data |
| iss, how many business days before the entity updates their active manual and/or automated screening systems against: 107 a Customer Data Same days to 2 business days 108 Does the Entity have a physical presence, e.g. tranches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions? 109 Confirm that all responses provided in the above Section are representative of fice and the branch/ses that this applies to. 110 Il appropriate, provide any additional information/context to the answers in this section. 111 Il appropriate, provide any additional information/context to the answers in this section. 112 Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered 111 C Internal policies for controlling money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered 111 C Internal policies for controlling money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered 111 C Internal policies for controlling money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered 111 C Internal policies for controlling money laundering, terrorist financing and sanctions violations relevant for the types of the types of products and services offered 111 C Internal policies for controlling money laundering, terrorist financing and sanctions violations relevant for the year of yea | | | |
| active manual and/or automated screening systems against 107 a Customer Data 108 Deste Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, DFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction- based Sanctions? 109 Confirm that all responses provided in the above Section are representative of all the LE's branches the branches that his applies to, the answers in this section. 110 If appropriate, provide any additional information/context to the answers in this section. 111 Does the Entity provide mandatory training, which includes: 111 a Identification and reporting of transactions to government authorities 111 b Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered 111 c Internal polices for controlling money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered 111 c Internal polices for controlling money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered 111 c Internal polices for controlling money laundering, terrorist financing and sanctions violations 111 c Internal polices for controlling money laundering, terrorist financing and sanctions violations 111 c Internal polices for controlling money laundering, terrorist financing and sanctions violations 111 c Internal polices for controlling money laundering, terrorist financing and sanctions violations 111 c Internal polices for controlling money laundering, terrorist financing and sanctions violations 111 c Internal polices for controlling money laundering, terrorist financing and sanctions violations 111 c Internal polices for controlling money laundering, terrorist financing and sanctions violations 111 c Internal polices for controlling money laundering, terrorist financing and sanctions violations 111 c Internal polices for contro | 107 | | |
| 107 b | | | |
| Same day to 2 business days | | | |
| Does the Entity have a physical presence, e.g. branches, subdidaries, or presentative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member ocuntries have enacted comprehensive jurisdiction-based Sanctions? 109 a regional all responses provided in the above Section at the proposition of | | | |
| subsidiaries, or representative offices located in countries/regions against which UN (PAC, CPS, EU or GY member countries have enacted comprehensive jurisdiction-based Sanctions? 109 Confirm that all responses provided in the above Section are representative of all the LE's branches 109 all ff. (calify 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. 111 Does the Entity provide mandatory training, which includes: 111 a Identification and reporting of transactions to government authorities 111 a Jednetification and reporting of transactions to government authorities 111 b Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered 111 c Internal policies for controlling money laundering, terrorist financing and sanctions violations 111 nernal policies for controlling money laundering, terrorist financing and sanctions violations 111 nernal policies for controlling money laundering, terrorist financing and sanctions violations 112 nerrorist financing and sanctions violations 113 New issues that occur in the market, e.g. significant regulatory actions or new regulators 114 a Badra and Senior Committee Management 115 Yes 116 Non-employed workers (contractors/consultant) 117 Non-employed workers (contractors/consultants) 118 Des the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities? 116 Light for the analysis of the provide for AML, CTF and Sanctions staril? 117 Annually 118 Non-employed workers (contractors/consultants) 119 Des the Entity provide customised training for AML, CTF and Sanctions staril? 119 Annually | | | Same day to 2 business days |
| countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction- based Sanctions? 109 a If sepanses provided in the above Section are representative of all the LE's branches 109 a If N, Clardy 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 branch'es that this applies to. 111 TRAINING & EDUCATION 11. TRAINING & EDUCATION 11. TRAINING & EDUCATION 11. Taxing the provide mandatory training, which includes: 11. a Identification and reporting of transactions to government authorities 11. a Identification and reporting of transactions to products and services offered products and services offered terrorist financing and sanctions violations relevant for the types of products and services offered terrorist financing and sanctions violations 11. a Internal policies for controlling money laundering, terrorist financing and sanctions violations 11. a Identification and reporting of transactions 11. a Identification and reporting of transactions to government authorities 11. a Identification and reporting of transactions to government authorities 11. a Identification and reporting of transactions to government authorities 11. a Identification and reporting of transactions to government authorities 11. a Identification and reporting of transactions to yes 11. a Identification and reporting of transactions to yes 11. a Identification and reporting of transactions to yes 11. a Identification and reporting of transactions to yes 11. a Identification and reporting of transactions to yes 11. a Identification and reporting of transactions to yes 11. a Identification and reporting of transactions to yes 11. a Identification and reporting of transactions to yes 11. a Identification and reporting transactions to yes 11. a Identification and reporting transactions to yes 11. a Identification and reporting transactions to yes 11. a Identification and repo | 108 | | |
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| includes: Identification and reporting of transactions to government authorities Yes | 11. TRAII | NING & EDUCATION | |
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| terrorist financing and sanctions violations 111 d New issues that occur in the market, e.g. significant regulatory actions or new regulations 111 e Conduct and Culture Yes 111 f Fraud Yes 1112 Is the above mandatory training provided to: 112 a Board and Senior Committee Management Yes 112 b 1st Line of Defence Yes 112 c 2nd Line of Defence Yes 112 d 3rd Line of Defence Yes 112 e Third parties to which specific FCC activities have been outsourced Yes 112 f Non-employed workers (contractors/consultants) Yes 113 Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities? 114 Does the Entity provide customised training for AML, CTF and Sanctions staff? 115 Confirm that all responses provided in the above Section | 111 c | Internal policies for controlling money laundering, | V |
| 111 d New issues that occur in the market, e.g. significant regulatory actions or new regulations 111 e Conduct and Culture Yes 111 f Fraud Yes 112 Is the above mandatory training provided to: 112 a Board and Senior Committee Management Yes 112 b 1st Line of Defence Yes 112 c 2nd Line of Defence Yes 112 d 3rd Line of Defence Yes 112 d 3rd Line of Defence Yes 112 e Third parties to which specific FCC activities have been outsourced 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? 115 Confirm that all responses provided in the above Section | | terrorist financing and sanctions violations | ies |
| regulatory actions or new regulations 111 e Conduct and Culture Yes 111 f Fraud Yes 112 Is the above mandatory training provided to: 112 a Board and Senior Committee Management Yes 112 b 1st Line of Defence Yes 112 c 2nd Line of Defence Yes 112 d 3rd Line of Defence Yes 112 e Third parties to which specific FCC activities have been outsourced 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? 115 Confirm that all responses provided in the above Section | 111 d | | V |
| 111 e Conduct and Culture Yes 111 f Fraud Yes 112 Is the above mandatory training provided to: 112 a Board and Senior Committee Management Yes 112 b 1st Line of Defence Yes 112 c 2nd Line of Defence Yes 112 d 3rd Line of Defence Yes 112 d 3rd Line of Defence Yes 112 e Third parties to which specific FCC activities have been outsourced Yes 112 f Non-employed workers (contractors/consultants) Yes 113 Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities? 114 Does the Entity provide customised training for AML, CTF and Sanctions staff? 115 Confirm that all responses provided in the above Section | - | | res |
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| 112 a Board and Senior Committee Management Yes 112 b 1st Line of Defence Yes 112 c 2nd Line of Defence Yes 112 d 3rd Line of Defence Yes 112 d Third parties to which specific FCC activities have been outsourced 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? 115 Confirm that all responses provided in the above Section | | Is the above mandatory training provided to: | |
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| 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? 115 Confirm that all responses provided in the above Section | 112 f | | Yes |
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| 114 Does the Entity provide customised training for AML, CTF and Sanctions staff? 114 If Y, how frequently is training delivered? 115 Confirm that all responses provided in the above Section | | | 160 |
| CTF and Sanctions staff? 114 a | 111 | | |
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| 115 Confirm that all responses provided in the above Section | 111 - | | Appually |
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| lare representative of all the LE's branches | 115 | | Voc |
| | | are representative of all the LE's branches | 165 |

| 115 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
|--|--|---------------------------------|
| 116 | If appropriate, provide any additional information/context to the answers in this section. | |
| 12. QUAL | ITY ASSURANCE /COMPLIANCE TESTING | |
| 117 | Does the Entity have a program wide risk based Quality | |
| l · · · | Assurance programme for financial crime (separate from the | Yes |
| | independent Audit function)? | |
| 118 | Does the Entity have a program wide risk based | |
| | Compliance Testing process (separate from the independent | Yes |
| | Audit function)? | |
| 119 | Confirm that all responses provided in the above Section | |
| - | are representative of all the LE's branches | Yes |
| 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. | |
| 13. AUDIT | | |
| 121 | In addition to inspections by the government | |
| | supervisors/regulators, does the Entity have an internal audit | |
| | function, a testing function or other independent third party, | Yes |
| | or both, that assesses FCC AML, CTF, ABC, Fraud and | Tes |
| | Sanctions policies and practices on a regular | |
| | basis? | |
| 122 | How often is the Entity audited on its AML, CTF, ABC, | |
| | Fraud and Sanctions programme by the following: | |
| 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 | Yes |
| | procedures | |
| 123 b | Enterprise Wide Risk Assessment | Yes |
| 123 c | Governance | Yes |
| 123 d | KYC/CDD/EDD and underlying methodologies | Yes |
| 123 e | Name Screening & List Management | Yes |
| 123 f | Reporting/Metrics & Management Information | Yes |
| | | |
| 123 g | Suspicious Activity Filing | Yes |
| 123 h | Technology | Yes Yes |
| 123 h 123 i | Technology Transaction Monitoring | Yes Yes Yes |
| 123 h 123 i 123 j | Technology Transaction Monitoring Transaction Screening including for sanctions | Yes Yes Yes Yes Yes |
| 123 h 123 i 123 j 123 k | Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education | Yes Yes Yes |
| 123 h 123 i 123 j 123 k 123 l | Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) | Yes Yes Yes Yes Yes |
| 123 h 123 i 123 j 123 k | Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to | Yes Yes Yes Yes Yes Yes |
| 123 h 123 i 123 j 123 k 123 l | Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and | Yes Yes Yes Yes Yes |
| 123 h 123 i 123 j 123 k 123 l 124 | Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? | Yes Yes Yes Yes Yes Yes |
| 123 h 123 i 123 j 123 k 123 l | Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section | Yes Yes Yes Yes Yes Yes |
| 123 h 123 i 123 j 123 k 123 l 124 | Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches | Yes Yes Yes Yes Yes Yes Yes |
| 123 h 123 i 123 j 123 k 123 l 124 | Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and | Yes Yes Yes Yes Yes Yes Yes |
| 123 h 123 i 123 j 123 k 123 l 124 125 | Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | Yes Yes Yes Yes Yes Yes Yes |
| 123 h 123 i 123 j 123 k 123 l 124 | Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to | Yes Yes Yes Yes Yes Yes Yes |
| 123 h 123 i 123 i 123 k 123 l 124 125 125 a | Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. | Yes Yes Yes Yes Yes Yes Yes |
| 123 h 123 i 123 j 123 j 123 k 123 l 124 125 125 126 14. FRAU | Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. | Yes Yes Yes Yes Yes Yes Yes |
| 123 h 123 i 123 i 123 k 123 l 124 125 125 a | Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. D Does the Entity have policies in place addressing fraud | Yes Yes Yes Yes Yes Yes Yes |
| 123 h 123 i 123 i 123 j 123 k 123 l 124 h 125 a 125 a 126 h 14. FRAU | Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. Does the Entity have policies in place addressing fraud risk? | Yes Yes Yes Yes Yes Yes Yes Yes |
| 123 h 123 i 123 j 123 j 123 k 123 l 124 125 125 125 a 126 | Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. D Does the Entity have policies in place addressing fraud | Yes Yes Yes Yes Yes Yes Yes Yes |

| 129 | Does the Entity have real time monitoring to detect fraud? | Yes |
|---|--|--|
| 130 | Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID? | Yes |
| 131 | Confirm that all responses provided in the above section are | Yes |
| 131 a | representative of all the LE's branches If N, clarify which questions the difference/s relate to and | d |
| | the branch/es that this applies to. | |
| 132 | If appropriate, provide any additional information/context to the answers in this section. | Q127. There are procedures aligned with the Global Fraud Policy Q128 &129. Only for credit cards, debit cards and electronic banking. There are other areas that are responsible for preventing and detecting Internal and Origination fraud. Q130. For electronic banking through Monitor Plus and Biocatch Q131. All responses are from the perspective of the Fraud Prevention area only. |
| | | |
| <u>Declarati</u> | on Statement | |
| Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4) Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent) | | |
| Scotiabank Inverlat S.A. Institucion de Banca Multiple, Grupo Financiero Scotiabank Inverlat (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, | Rachelle Hildyard (Global I | Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that |
| the answe | | rect to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution. |
| | | |
| l, | | or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg |
| CBDDQ a | re complete and correct to my nonest belier, and that I am au | uthorised to execute this declaration on behalf of the Financial Institution. |
| , | Rachelle Hildyard (Signature Dan Shonfeld (Signature | e & Date) August 18, 2024 |
| | Dan Shonfeld (Signature | e & Date) August 22, 2024 |
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