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



Financial Institution ! Scotiabank Colpatria S.A. Location (Country): Colombia

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 Colpatria S.A
2	Append a list of foreign branches which are covered by this questionnaire	N/A
3	Full Legal (Registered) Address	Carrera 7 No 24/89, Bogota Piso 10, Distrito Capital, Colombia
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	7 de diciembre de 1972
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 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	https://scotiabankfiles.azureedge.net/scotiabank-colombia/Colpatria/pdf/acerca-de/inversionistas/composicion-accionaria-banco-colpatria.pdf
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	N/A
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	Superintendencia Financiera de Colombia
11	Provide Legal Entity Identifier (LEI) if available	5493003NMRIY0Z3WLF37
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 14 h	Broker/Dealer	No No
14 i	Multilateral Development Bank	No .
14 j	Wealth Management	Yes
14 k	Other (please explain)	
	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	N/A
	customers are located.	150
	Select the closest value:	
16 a	Number of employees	5001-10000
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section are	Yes
	representative of all the LE's branches.	Tes .
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	
į į	the answers in this section.	
2 PROPIL	CTS & SERVICES	
	Does the Entity offer the following products and services:	
	3	No
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking	
	services to domestic banks?	
19 a1b	Does the Entity allow domestic bank clients to	
	provide downstream relationships?	
19 a1c	Does the Entity have processes and procedures in	
	place to identify downstream relationships with	
	domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking	
	services to foreign banks?	
19 a1e	Does the Entity allow downstream relationships with	
	foreign banks?	
19 a1f	Does the Entity have processes and procedures in	
	place to identify downstream relationships with foreign	
19 a1g	Does the Entity offer Correspondent Banking services	
~ .	to regulated Money Services Businesses	
'		
	(MSBs)/Money Value Transfer Services (MVTSs)?	
19 a1h	(MSBs)/Money Value Transfer Services (MVTSs)?	
19 a1h	(MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with	
19 a1h 19 a1h1	(MSBs)/Money Value Transfer Services (MVTSs)?	
19 a1h1	(MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? MSBs	
	(MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	

19 a1i	Does the Entity have processes and procedures in	
	place to identify downstream relationships with	
	MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	Yes
19 e	Hold Mail	No No
19 f	International Cash Letter	Yes
19 g	Low Price Securities	No .
19 h	Payable Through Accounts	No .
19 i		No No
191	third party payment services to their customers?	
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	
	Virtual Asset Service Providers (VASPs)	
19 i3		
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	
19 ј	Private Banking	Yes
19 k	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
19 p	For each of the following please state whether you offer	
	the service to walk-in customers and if so, the	
	applicable level of due diligence:	
19 p1	Check cashing service	Yes
19 p1a	If yes, state the applicable level of due diligence	Identification and verification
19 p2	Wire transfers	No No
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	
19 p5	If you offer other services to walk-in customers please	
60	provide more detail here, including describing the level	
	of due diligence.	
19 q	Other high-risk products and services identified by the	
	Entity (please specify)	N/A
20	Confirm that all responses provided in the above Section	
1	are representative of all the LE's branches.	Yes
20 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to	
	the answers in this section.	
3. AML. C	TF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum	
~~	AML, CTF and Sanctions standards regarding the following	
	components:	
22 a	Appointed Officer with sufficient experience/expertise	Yes
22 a 22 b	Adverse Information Screening	Yes
22 D	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 I	Sanctions	Yes

	T	
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	No
	Committee? If N, describe your practice in	NO
	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	N/A
	the branch/es that this applies to.	N/A
29	If appropriate, provide any additional information/context to the answers in this section.	In regards to Q24, The Board of Directors approve the Enterprise AML/ATF and Sanctions Policy every 2 years, unless there is a material regulatory or business change that requires a more frequent update and approval.
4 ANTID	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and requirements	Yes
	to reasonably prevent, detect and report	
	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
24	experience/expertise to implement the ABC programme?	Both joint ventures and third parties acting on behalf of the Entity
34	Is the Entity's ABC programme applicable to:	Pour John volkares and tillio parties adding on behall 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	
	advantage	
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 c	Includes a prohibition against the falsification of books and	
	records (this may be within the ABC policy or any other	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	Yes
20	reporting on the status of the ABC programme?	
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the	
33	net result of the controls effectiveness and the	Yes
	inherent risk assessment?	1.00
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	

40 b	Corruption risks associated with the countries and	
	industries in which the Entity does business, directly or	Yes
	through intermediaries	
40 c	Transactions, products or services, including those that	
	involve state-owned or state-controlled entities or	Yes
	public officials	Tes .
10.1		
40 d	Corruption risks associated with gifts and hospitality,	
	hiring/internships, charitable donations and political	Yes
	contributions	
40 e	Changes in business activities that may materially	Yes
	increase the Entity's corruption risk	les
41	Does the Entity's internal audit function or other independent	
1	third party cover ABC Policies and	Yes
	Procedures?	
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities	
	subject to ABC risk have been outsourced	Yes
42 f	Non-employed workers as appropriate	
72 1	(contractors/consultants)	Yes
40		
43	Does the Entity provide ABC training that is targeted to	Yes
<u> </u>	specific roles, responsibilities and activities?	
44	Confirm that all responses provided in the above Section are	Yes
	representative of all the LE's branches	100
44 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	N/A
45	If appropriate, provide any additional information/context to	
	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
	and anowers 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
		ourselves, we do ensure that 3rd parties have either satisfactory training in place or the appropriate policies and controls.
5. AML, C	TF & SANCTIONS POLICIES & PROCEDURES	
5. AML, C 46	Has the Entity documented policies and procedures	
	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	Van
46 46 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering	Yes
46 a 46 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing	Yes
46 a 46 b 46 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations	
46 a 46 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing	Yes Yes
46 a 46 b 46 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations	Yes
46 a 46 b 46 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least	Yes Yes
46 a 46 b 46 c 47	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and	Yes Yes
46 a 46 b 46 c 47	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against:	Yes Yes No
46 a 46 b 46 c 47 48	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards	Yes Yes No Yes
46 a 46 b 46 c 47 48 a 48 a 48 a 1	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results?	Yes Yes No Yes Yes
46 a 46 b 46 c 47 48 a 48 a 1 48 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards	Yes Yes No Yes Yes Yes Yes Yes
46 a 46 b 46 c 47 48 a 48 a 48 a 1	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results?	Yes Yes No Yes Yes
46 a 46 b 46 c 47 48 48 a 48 a 1 48 b 48 b 1	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	Yes Yes No Yes Yes Yes Yes Yes
46 a 46 b 46 c 47 48 a 48 a 1 48 b 48 b 1 49	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that:	Yes Yes No Yes Yes Yes Yes Yes Yes
46 a 46 b 46 c 47 48 48 a 48 a 1 48 b 48 b 1	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and	Yes Yes No Yes Yes Yes Yes Yes
46 a 46 b 46 c 47 48 a 48 a 1 48 b 48 b 1 49 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes Yes No Yes Yes Yes Yes Yes Yes
46 a 46 b 46 c 47 48 a 48 a 1 48 b 48 b 1 49	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for	Yes Yes No Yes Yes Yes Yes Yes Yes
46 a 46 a 46 b 46 c 47 48 a 48 a 1 48 b 48 b 1 49 a 49 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes Yes No Yes Yes Yes Yes Yes Yes Yes
46 a 46 b 46 c 47 48 a 48 a 1 48 b 48 b 1 49 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide	Yes Yes No Yes Yes Yes Yes Yes Yes Yes Yes Yes
46 a 46 b 46 c 47 48 a 48 a 1 48 b 48 b 1 49 a 49 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes Yes No Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
46 a 46 a 46 b 46 c 47 48 a 48 a 1 48 b 48 b 1 49 a 49 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide	Yes Yes No Yes Yes Yes Yes Yes Yes Yes Yes Yes
46 a 46 b 46 c 47 48 a 48 a 1 48 b 49 a 49 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes Yes No Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
46 a 46 b 46 c 47 48 48 a 48 a 1 48 b 1 49 a 49 b 49 c 49 d	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with other entities that provides	Yes Yes No Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
46 a 46 b 46 c 47 48 a 48 a 1 48 b 49 a 49 c 49 d 49 e	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money Jundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for 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 Yes No Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
46 a 46 b 46 c 47 48 48 a 48 a 1 48 b 1 49 a 49 b 49 c 49 d	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with other entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for services to shell banks Prohibit opening and keeping of accounts for Section	Yes Yes No Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
46 a 46 a 46 b 46 c 47 48 a 48 a 1 48 b 1 49 a 49 c 49 d 49 e 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with other entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities	Yes Yes No Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
46 a 46 b 46 c 47 48 a 48 a 1 48 b 49 a 49 c 49 d 49 e	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts 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 Section 311 designated entities Prohibit opening and keeping of accounts for any of	Yes Yes No Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
46 a 46 a 46 b 46 c 47 48 a 48 a 1 48 b 1 49 a 49 b 49 c 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity spolicies and procedures updated at least annually? LS. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Possibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit aclaing 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 No Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
46 a 46 b 46 c 47 48 48 a 48 a 1 48 b 1 49 a 49 c 49 c 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed 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 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 No Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
46 a 46 a 46 b 46 c 47 48 a 48 a 1 48 b 1 49 a 49 b 49 c 49 f 49 g	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with other entity that provides services to shell banks Prohibit opening and keeping of accounts for 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 No Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
46 a 46 a 46 b 46 c 47 48 a 48 a 1 48 b 1 49 a 49 b 49 c 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed 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 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 No Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
46 a 46 a 46 b 46 c 47 48 a 48 a 1 48 b 1 49 a 49 b 49 c 49 f 49 g	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with other entity that provides services to shell banks Prohibit opening and keeping of accounts for 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 No Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 b 49 b 49 c 49 c 49 d 49 e 49 f 49 g	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money Jundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit accounts/relationships with shell banks Prohibit dealing with other entities that provide banking services to unlicensed 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 No Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye

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	
	reasons that applies across the entity, including foreign	Yes
	branches and affiliates	
49 I	Define the process and controls to identify and handle	
731	customers that were previously exited for financial crime	
	reasons if they seek to re-establish a	Yes
	relationship	
49 m	Outline the processes regarding screening for sanctions,	+
49 111	PEPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal	
49 N	"watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar	l.
1	document which defines a risk boundary around	Yes
	their business?	
51	Does the Entity have record retention procedures that	Yes
 	comply with applicable laws?	
51 a	If Y, what is the retention period?	5 years or more
52	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	177
52 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	N/A
53	If appropriate, provide any additional information/context to	In regards to Q47, the Board of Directors approve the Enterprise AML/ATF and Sanctions Policy every 2 years, unless there is a material
	the answers in this section.	regulatory or business change that requires a more frequent update and approval.
,	CTF & SANCTIONS RISK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the inherent	
	risk components detailed below:	
54 a	Client	Yes
54 b	Product	Yes
54 c	Channel	Yes
54 d	Geography	Yes
55	Does the Entity's AML & CTF EWRA cover the controls	
1	effectiveness components detailed below:	
55 a	Transaction Monitoring	Yes
55 b	Customer Due Diligence	Yes
55 c	PEP Identification	Yes
55 d	Transaction Screening	Yes
55 u	Name Screening against Adverse Media/Negative News	Yes
	Training and Education	
55 f		Yes L.
55 g	Governance	Yes
55 h	1	N .
	Management Information	Yes
56	Has the Entity's AML & CTF EWRA been completed in	
56		Yes Yes
56 56 a	Has the Entity's AML & CTF EWRA been completed in	Yes
	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	
	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
56 a	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
56 a 57	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 N/A
56 a 57 57 a	Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes N/A Yes
56 a 57 57 a 57 b	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 N/A Yes Yes
56 a 57 57 a 57 b 57 c	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 Yes Yes Yes Yes
56 a 57 57 a 57 b 57 c 57 d	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 N/A Yes Yes
56 a 57 57 a 57 b 57 c	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 Yes Yes Yes Yes
56 a 57 57 a 57 b 57 c 57 d 58	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 N/A Yes Yes Yes Yes Yes
56 a 57 57 a 57 b 57 c 57 d 58 58 a	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 N/A Yes Yes Yes Yes Yes Yes Yes
56 a 57 57 a 57 b 57 c 57 d 58 58 a 58 a	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 N/A Yes Yes Yes Yes Yes Yes Yes Yes
56 a 57 57 a 57 b 57 c 57 d 58 58 a	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 N/A Yes Yes Yes Yes Yes Yes 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?	165
59 a	If N, provide the date when the last Sanctions EWRA was	N/A
	completed.	197
60	Confirm that all responses provided in the above Section are	Yes
	representative of all the LE's branches	
60 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	N/A
61	If appropriate, provide any additional information/context to	N/A
- 10/0 0	the answers in this section.	IVA
	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	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	
66	What is the Entity's minimum (lowest) threshold applied	Other (specify the percentage)
	to beneficial ownership identification?	Other (specify the percentage)
67	Does the due diligence process result in customers	Yes
	receiving a risk classification?	
67 a	If Y, what factors/criteria are used to determine the	
L	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3 67 a4	Business Type/Industry	Yes Yes
67 a4	Legal Entity type 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	
33	part of your KYC process?	No
68 a	If Y, is this at:	
68 a1	Onboarding	
68 a2	KYC renewal	
68 a3	Trigger event	
68 a4	Other	
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening	Yes
	customers for Adverse Media/Negative News?	100
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

71 a 71 a2 71 a3	Trigger event What is the method used by the Entity to screen for Adverse Media/Negative News? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event	Yes Combination of automated and manual Yes Yes
71 D Ct at 71 a	Adverse Media/Negative News? Does the Entity have a risk based approach to screening sustomers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal	Yes
71 a 71 a2 71 a3	customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal	
71 a1 71 a2 71 a3	Onboarding KYC renewal	Yes
71 a2 71 a3	KYC renewal	Yes
71 a3		
	Trigger event	Yes
		Yes
12	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73 D	Does the Entity have policies, procedures and processes to	
cu	eview and escalate potential matches from screening sustomers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
	s 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	Yes
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	No .
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
76 F in	From the list below, which categories of customers or ndustries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Prohibited
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	Always subject to EDD
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	Prohibited
76 h	MSB/MVTS customers	Always subject to EDD
76 i	Non-account customers	Prohibited
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	EDD on risk-based approach
76 I	Nuclear power	Do not have this category of customer or industry
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	Prohibited
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v	Unregulated charities	Prohibited
76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers	Prohibited N/A
76 y	Other (specify)	N/A Additional controls, enhanced and/or specialized due diligence are applied to customers subject to restrictions based on regulatory
	f restricted, provide details of the restriction	Additional controls, ennanced and/or specialized due diligence are applied to customers subject to restrictions based on regulatory requirements or the Bank's risk appetite.
	Does EDD require senior business management and/or compliance approval?	Yes

70 -	If V is discarded the account.	Social hydrogo manager
78 a	If Y indicate who provides the approval:	Senior business manager
79	Does the Entity have specific procedures for onboarding	V
	entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Yes
80	Does the Entity perform an additional control or quality	
00	review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to	
82	If appropriate, provide any additional information/context to	With regards to questions 64g and 64h, the gathering of Source of Funds and Source of Wealth is determined using a risk based approach
	the answers in this section.	and at a minimum is done in cases of high risk when EDD is required and/or for specific product types (e.g. mortgages). For question 66, the minimum threshold applied to beneficial ownership identification is 5%.
8 MONITO	ORING & REPORTING	and minimum andonolog approach of donologic officionist advantage and the donologic approach of donologic officionist and an analysis of the donologic approach of the donologic official and an analysis of the donologic official approach of the donologic official and an analysis of the donologic official approach of the donologic official and an analysis of the donologic official analysis of the donologic official and an analysis of the donologic official analysis of the donologic officia
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of	Yes
	suspicious activity?	les
84	What is the method used by the Entity to monitor	
ا آ	transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what type of	
	transactions are monitored manually	Operations which need more details, like operations in cash, transfers, wires, etc. That not are included in the automatic transaction
84 b	If automated or combination selected, are internal system	Internal System
	or vendor-sourced tools used?	ilitaria system
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the	
	name of the vendor/tool?	
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring	
	application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report	Yes
	suspicious transactions?	177
85 a	If Y, does the Entity have policies, procedures and	
	processes to comply with suspicious transaction	Yes
86	reporting requirements? Does the Entity have policies, procedures and processes to	
00	review and escalate matters arising from the monitoring of	Yes
	customer transactions and activity?	1.00
87	Does the Entity have a data quality management	
1-7	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
00	manner?	
90	Confirm that all responses provided in the above Section are	Yes
90 a	representative of all the LE's branches If N, clarify which questions the difference/s relate to and	
50 a	the branch/es that this applies to	N/A
91	If appropriate, provide any additional information/context to	
J .	the answers in this section.	N/A
9. PAYME	ENT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment	
-	Transparency Standards?	Yes
	Transparoncy oldination	

	<u> </u>	
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	Organic Statute of the Financial System, Articles 102 to 107 Prevention of Criminal Activities. Basic Legal Circular, Part 1, Title IV, Chapter IV-Instructions Relating to the Risk Management of Money Laundering and Terrorism Financing SARLAFT. Superintendence of Colombia,
00 -	If N, explain	Circular Letter 11 of 2020 Financial Superintendency. N/A
93 c 94		TWO
94	Does the Entity have controls to support the inclusion of	Yes
	required and accurate originator information in cross	Yes
	border payment messages?	
95	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	
96	Confirm that all responses provided in the above Section	Yes
00 -	are representative of all the LE's branches	N/A
96 a	If N, clarify which questions the difference/s relate to and	IWA
07	the branch/es that this applies to.	N/A
97	If appropriate, provide any additional information/context to	IWA
40 041:0	the answers in this section.	
10. SANC		
98	Does the Entity have a Sanctions Policy approved by	
	management regarding compliance with sanctions law	
	applicable to the Entity, including with respect to its business	Yes
	conducted with, or through accounts held at foreign financial	
	institutions?	
99	Does the Entity have policies, procedures, or other controls	
	reasonably designed to prevent the use of another entity's	
	accounts or services in a manner causing the other entity to	Yes
	violate sanctions prohibitions applicable to the other entity	Tes .
	(including prohibitions within	
	the other entity's local jurisdiction)?	
100	Does the Entity have policies, procedures or other controls	
	reasonably designed to prohibit and/or detect actions taken	
	to evade applicable sanctions prohibitions, such as stripping,	Yes
	or the resubmission and/or masking, of sanctions relevant	
	information in cross border transactions?	
101	Does the Entity screen its customers, including beneficial	
	ownership information collected by the Entity, during	Yes
	onboarding and regularly thereafter against Sanctions	
	Lists?	
102	What is the method used by the Entity for sanctions	Both Automated and Manual
	screening?	
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	Available upon request
	is the name of the vendor/tool?	
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	
	'Other' please explain in	
103	Does the Entity screen all sanctions relevant data, including	
	at a minimum, entity and location information, contained in	Yes
	cross border transactions against Sanctions	
	Lists?	
104	What is the method used by the Entity?	Automated

Does the Entily have a data quality management programme to ensure that complete data for all the translations are subject to sanctions servering creates that complete data for all the translations are subject to sanctions servering creates that the subject to sanctions servering creates the Entity in its sanctions servering creates that the subject to sanctions and subject to sanctions			,
transactions are subsect to sanctions screening? 106 Select the Sanctions Lists under your state of the transactions of the sanctions screening processes: 107 a Conditional Lists LIM. 108 c Office of Financial Sanctions Security Council 108 c Office of Financial Sanctions Intermeted of the Treasury's Office of Financial Sanctions Intermeted Sanctions Interm	105	Does the Entity have a data quality management programme	
Select the Sanctions Lists used by the Entity in its sending seriening processes: 106 a Consolidated United Nations Security Council Sendons List UNIV. 106 b United States Department of the Treasury's Office of Consolidated United Nations Security Council Sendons List UNIV. 106 c Long Assets Council Off-RCI. 107 c United States Department of the Treasury's Office of Consolidated List (EU) 108 d List manufactors of the Consolidated List (EU) 108 d List manufactors of the Consolidated List (EU) 108 d List manufactors of the Consolidated List (EU) 109 d List manufactors of the Consolidated List (EU) 108 d List manufactors of the Consolidated List (EU) 109 d Viber regulatory authorises make updates to their Sanctions list, how many business days before the entity updates their active manufactors of the entity updates their active manufactors described the entity updates their active manufactors of the entity of		to ensure that complete data for all	Yes
sanctions screening processes: 106 a Consolidated Unlined Nations Security Council Sanctions List (UN) 106 b United States Department of the Treasury's Office of Foreign Assets Control (OFAC) 107 b United States Department of the Treasury's Office of Foreign Assets Control (OFAC) 108 c United States Department of the Treasury's Office of Foreign Assets Control (OFAC) 109 c United States Department of the Treasury's Office of Foreign Assets Control (OFAC) 109 c United States Department of the Treasury's Office of Foreign Assets Control (OFAC) 109 c United States Department of the Treasury's Office of Foreign Assets Control (OFAC) 109 c United States Department of the Treasury's Office of States Office Assets Control (OFAC) 109 c United States Department of the Treasury's Office of States Office Assets Office Assets and the Montal Control and the United States Office Assets Office Assets and the Montal Control and the United States Office Assets Office Assets and the Montal Control (OFAC) 109 c Ontrine that of Enrich phrase Interest of States Office Assets		transactions are subject to sanctions screening?	
Consolidated United Nations Security Council Se	106	Select the Sanctions Lists used by the Entity in its	
Senctions List (IN) 106 b			
Senctions List (IN) 106 b	106 a	Consolidated United Nations Security Council	
Foreign Assets Control (OFAC) 6 C Micro of Financial Sanctionia (Implementation HMT (OFS)) 106 d European Union Consolidated List (EU) 106 de List similatined by Union Grancidated List (EU) 106 de List similatined by Union Grancidated List (EU) 107 When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their sanctions list, how many business days before the entity updates their sanctions list, how many business days before the entity updates their sanctions list, how many business days before the entity updates their sanctions list, how many business days before the entity updates their sanctions list, how many business days before the entity updates their sanctions list, how many business days listed to the sanctions list, how many business days listed to the sanctions list, how many business days listed to the sanctions list, how many business days listed liste		Sanctions List (UN)	Used for screening customers and beneficial owners and for liftening transactional data
Foreign Assets Control (UP-AC) Used for screening customers and beneficial counters and the filtering transactional data	106 b	United States Department of the Treasury's Office of	
166 Livropean Union Consolidated List (EU) Used for screening outsterners and the melitace cowers and for filtering transactional data		Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 Usts maintained by other G7 member countries Used for screening outsteners and hereficial owners and for littering transactional data	106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
107 When regulatory suthorities 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 Sanctions visibility and submitted 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 N, derify which questions the difference's relate to and are representatives of leat the LE & branches are representatives of leat of the LE & branches are representatives of leat the LE & branches are represented to the LE & branches are represente	106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
107 When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against: 107 a Customer Data Sancions Sancions (a.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 The Charly which questions the difference/s relate to and the branch/set shat this applies to. 110 fl appropriate, provide any additional information/context to the answers in this section. 111 Does the Entity provide mandatory training, which includes: 112 a Identification and reporting of transactions to government authorities. 113 discrimination and senorities of transactions to government authorities. 114 C Internal policies for controlling money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered. 115 Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered. 116 Paud 1 Pa	106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
When regulatory authorities make undates to their Sanctions Ist, how many business days before the entity updates their active manual and/or automated screening systems against:	106 f		Ŭ Ü
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115 Confirm that all responses provided in the above Section	444.5		Annually
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are representative of all the LE's branches	115		Yes
·		are representative of all the LE's branches	

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
116	If appropriate, provide any additional information/context to the answers in this section.	N/A
12. QUAI	LITY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality	
	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
440	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	
113 a	the branch/es that this applies to.	N/A
120	If appropriate, provide any additional information/context to	
-	the answers in this section.	N/A
13. AUDI	Т	
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	
	Sanctions policies and practices on a regular	
122	basis? How often is the Entity audited on its AML, CTF, ABC,	
122	Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Yearly
123	Does the internal audit function or other independent third	
0	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 Suspicious Activity Filing	Yes Yes
123 g 123 h	Technology	Yes
123 ii	Transaction Monitoring	Yes
123 j	Transaction Worldoning Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123 I	Other (specify)	N/A
124	Are adverse findings from internal & external audit tracked to	
	completion and assessed for adequacy and	Yes
	completeness?	
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to and	
123 a	the branch/es that this applies to.	N/A
126	If appropriate, provide any additional information/context to	
	the answers in this section.	N/A
14. FRAU		
127	Does the Entity have policies in place addressing fraud	V
L	risk?	Yes
128	Does the Entity have a dedicated team responsible for	Yes
	preventing & detecting fraud?	100
		· · · · · · · · · · · · · · · · · · ·

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		
	the branch/es that this applies to.		
100		N/A	
132	If appropriate, provide any additional information/context to the answers in this section.		
		N/A	
<u>Declaration Statement</u>			
Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4) Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)			
Scotiabank Colpatria S.A. Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.			
levery entor to remain in run compilance with an applicable infancial crime laws, regulations and standards in all of the jurisdictions in which it does business and noids 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 Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.			
I,Dan Shonfeld (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.			
	Cachelle Hildyard (Signature 8 Dan Shonfeld (Signature 8	k Date)	June 28, 2024
	Dan Shonfeld (Signature 8	k Date)	July 19, 2024