the Wolfsberg Group

Financial Institution Name: Location (Country) : PUBLIC JOINT-STOCK COMPANY JOINT STOCK BANK 'UKRGASBANK'
Ukraine

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 repaired by the first that offers a senerate questionnaire can be completed for that branch.

Y & OWNERSHIP Full Legal Name Append a list of foreign branches which are covered by this questionnaire	PUBLIC JOINT-STOCK COMPANY JOINT STOCK BANK 'UKRGASBANK' (JSB 'UKRGASBANK')
Append a list of foreign branches which are covered by	
this questionnaire	LOD HIKO CAODANIKI L
	JSB 'UKRGASBANK' does not have foreign branches. The list of domestic branches, please find by the following
	link: https://www.ukrgasbank.com/en/contacts/atm/
	liirk, https://www.ukigaspank.com/en/contacts/atm/
Full Legal (Registered) Address	
	1, Yerevanska str., Kyiv, 03087, Ukraine
Full Primary Business Address (if different from above)	
	24 Machailtean Str. Kritis Dachasteri district 04504 (Dania Business Contro 7th floor)
	2A, Mechnikova Str., Kyiv, Pecherskyi district, 01601 (Parus Business Centre, 7th floor)
Date of Entity incorporation/establishment	
	July 21, 1993
Select type of ownership and append an ownership chart	
if available	
Publicly Traded (25% of shares publicly traded)	No
If Y, indicate the exchange traded on and ticker	
symbol	
	n/a
Member Owned/Mutual	No
	Yes
	No
	n/a
% of the Entity's total shares composed of bearer shares	
, , , , , , , , , , , , , , , , , , , ,	
	JSB "UKRGASBANK" does not issue bearer shares.
Does the Entity, or any of its branches, operate under an	N-
Offshore Banking License (OBL)?	No
operate under an OBL	
	n/a
	no
and the process of the state of	
	The National Bank of Ukraine
Provide Legal Entity Identifier (LEI) if available	
(22)	
	254900M9927XDGPXJ562
Provide the full legal name of the ultimate parent (if	
different from the Entity completing the DDQ)	
different from the Entity completing the DDQ)	n/a
different from the Entity completing the DDQ)	n/a
Jurisdiction of licensing authority and regulator of ultimate	
Jurisdiction of licensing authority and regulator of ultimate	
Jurisdiction of licensing authority and regulator of ultimate	
	Full Primary Business Address (if different from above) Date of Entity incorporation/establishment Select type of ownership and append an ownership chart if available Publicly Traded (25% of shares publicly traded) If Y, Indicate the exchange traded on and ticker symbol Member Owned/Mutual Government or State Owned by 25% or more Privately Owned If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more % of the Entity's total shares composed of bearer shares Does the Entity, or any of its branches, operate under an

14 b 14 c 14 d 14 e 14 f 14 g 14 h 14 i 14 i 14 i	Commercial Banking Transactional Banking Investment Banking Financial Markets Trading Securities Services/Custody Broker/Dealer Multilateral Development Bank Wealth Management Other (please explain)	Yes
14 c 14 d 14 e 14 f 14 g 14 h 14 i 14 j	Commercial Banking Transactional Banking Investment Banking Financial Markets Trading Securities Services/Custody Broker/Dealer Multilateral Development Bank Wealth Management Other (please explain)	Yes Yes Yes Yes Yes Yes Yes Yes Yes
14 d 14 e 14 f 14 g 14 h 14 i 14 j	Transactional Banking Investment Banking Financial Markets Trading Securities Services/Custody Broker/Dealer Multilateral Development Bank Wealth Management Other (please explain)	Yes Yes Yes Yes Yes Yes Yes No
14 e 14 f 14 g 14 h 14 i 14 j	Investment Banking Financial Markets Trading Securities Services/Custody Broker/Dealer Multilateral Development Bank Wealth Management Other (please explain)	Yes Yes Yes Yes Yes Yes Yes
14 f 14 g 14 h 14 i 14 i	Financial Markets Trading Securities Services/Custody Broker/Dealer Multilateral Development Bank Wealth Management Other (please explain)	Yes Yes Yes No Yes
14 f 14 g 14 h 14 i 14 i	Financial Markets Trading Securities Services/Custody Broker/Dealer Multilateral Development Bank Wealth Management Other (please explain)	Yes Yes Yes No Yes
14 g 14 h 14 i 14 j	Securities Services/Custody Broker/Dealer Multilateral Development Bank Wealth Management Other (please explain)	Yes Yes No Yes
14 h 14 i 14 j	Broker/Dealer Multilateral Development Bank Wealth Management Other (please explain)	Yes No Yes
14 i 14 j	Multilateral Development Bank Wealth Management Other (please explain)	No Yes
14 i 14 j	Multilateral Development Bank Wealth Management Other (please explain)	No Yes
14 j	Wealth Management Other (please explain)	Yes
	Other (please explain)	
14 k		n/a
		n/a
		n/a
		· · · · · · · · · · · · · · · · · · ·
	i	
15 D	Does the Entity have a significant (10% or more) portfolio	
	• • • • • • • • • • • • • • • • • • • •	
	of non-resident customers or does it derive more than	
1	10% of its revenue from non-resident customers? (Non-	No
re	resident means customers primarily resident in a different	140
	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.	
		n/a
l		
16 S	Select the closest value:	
16 a	Number of employees	1001-5000
16 b		Between \$100 and \$500 million
		Between \$100 and \$300 filmion
	Confirm that all responses provided in the above Section	Yes
a	are representative of all the LE's branches.	165
17 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
		n/a
1		
1		
18 If	If appropriate, provide any additional information/context	
10 11		
l.		
to	to the answers in this section.	
to		п/а
to		п/а
to		п/а
	to the answers in this section.	n/a
2. PRODUCT	to the answers in this section. TS & SERVICES	n/a
2. PRODUCT	to the answers in this section.	п/а
2. PRODUCT	to the answers in this section. TS & SERVICES	n/a
2. PRODUCT	to the answers in this section. TS & SERVICES Does the Entity offer the following products and services:	
2. PRODUCT 19 D	to the answers in this section. TS & SERVICES Does the Entity offer the following products and services: Correspondent Banking	п/a Yes
2. PRODUCT 19 C 19 a C 19 a1	to the answers in this section. TS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y	
2. PRODUCT 19 D	to the answers in this section. TS & SERVICES Does the Entity offer the following products and services: Correspondent Banking	Yes
2. PRODUCT 19 C 19 a C 19 a1	TS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking	
2. PRODUCT 19 D 19 a C 19 a1 19 a1a	to the answers in this section. TS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks?	Yes Yes
2. PRODUCT 19 C 19 a C 19 a1	TS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to	Yes
2. PRODUCT 19	TS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships?	Yes Yes
2. PRODUCT 19 D 19 a C 19 a1 19 a1a	TS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to	Yes Yes
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2. PRODUCT 19	to the answers in this section. TS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	Yes Yes Ves Yes Yes Yes
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2. PRODUCT 19 19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1f 19 a1f 19 a1f	TS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity forer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? MSBs	Yes No Yes No Yes No No
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19 a C 19 a1 C	TS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? MSBs MVTSs	Yes No Yes No Yes No No No No
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2. PRODUCT 19	to the answers in this section. TS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	Yes Yes No Yes No Yes No No
2. PRODUCT 19 19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1f 19 a1f 19 a1f	TS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity forer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? MSBs	Yes No Yes No Yes No No
19 a C 19 a1 C	TS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? MSBs MVTSs	Yes No Yes No Yes No No No No
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Does the Entity have processes and procedures in	
	Yes
MSBs /MVTSs/PSPs?	Table
	No
	No
	Yes
Domestic Bulk Cash Delivery	No
	No .
	No .
201111100 0010110	No
Payable Through Accounts	No
	No
If V I a a a a least all the tempty below?	
Third Party Payment Service Providers	No
Virtual Asset Service Providers (VASPs)	No
eCommerce Platforms	No
Olici - Ficaso Ospialii	n/a
DZ ata O alifa	Dath
	Both
	No .
Sponsoring Private ATMs	No
	No
	Yes
Til tadi 7 teeta	No
For each of the following please state whether you	
	No
Check cashing service	
	Yes
If yes, state the applicable level of due diligence	Due Diligence
	Yes
If you state the applicable level of due diligence	
	Yes
	Identification and Venification
If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	Due diligence is carried out, if necessary, depending on the service provided, on the basis of official identity documents. When performing a transaction, an individual is verified on the basis of a passport presented.
Other high-risk products and services identified by the Entity (please specify)	
	n/a
Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
are representative of all the LE's branches. If N, clarify which questions the difference/s relate to	Yes
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 n/a
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 n/a
are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	Yes n/a n/a
are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise	Yes n/a n/a
are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	Yes n/a n/a
are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening	Yes n/a n/a Yes Yes Yes
are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership	Yes n/a n/a r/es Yes Yes Yes Yes
are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting	Yes n/a n/a ves yes yes yes yes
are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD	Yes n/a n/a ves yes yes yes yes yes yes
are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting	Yes n/a n/a ves yes yes yes yes
are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	Yes n/a n/a Yes Yes Yes Yes Yes Yes Yes Ye
are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Yes n/a n/a r/s res yes yes yes yes yes yes ye
are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Yes n/a n/a n/a vestign of the control of the c
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. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes n/a n/a n/a r/s res yes yes yes yes yes yes ye
are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Yes n/a n/a ves Yes Yes Yes Yes Yes Yes Yes
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	Cross-Border Remittances Domestic Bulk Cash Delivery Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their customers? If Y , please select all that apply below? Third Party Payment Service Providers Virtual Asset Service Providers (VASPs) eCommerce Platforms Other - Please explain Private Banking Remote Deposit Capture (RDC) Sponsoring Private ATMs Stored Value Instruments Trade Finance Virtual Assets 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: Check cashing service If yes, state the applicable level of due diligence Foreign currency conversion If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence of you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the

22 m	Constitute Author Description	V
	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,	11-100
24	CTF & Sanctions Compliance Department?	
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior	
	Management Committee? If N, describe your practice in	Yes
	Question 29.	
25	Does the Board receive, assess, and challenge regular	
20	reporting on the status of the AML, CTF, & Sanctions	Yes
	programme?	165
26	Does the Entity use third parties to carry out any	
	components of its AML, CTF & Sanctions programme?	No
20 -	If Y, provide further details	
26 a	it 1, provide further details	
		n/a
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	165
28 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	. .
		n/a
29	If appropriate, provide any additional information/context	
	to the answers in this section.	24:The policy on AML/CFT and sanctions is updated at least once a year or more often. The Bank's internal
	The district in the decident	regulations on AML/CFT are approved by the Bank's Management Board in case of changes,caused by changes
		in the legislation of Ukraine,the Bank's activities,the introduction of new services/other significant changes.
Constanting to the same		
4. ANTI E	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and	Yes
	requirements to reasonably prevent, detect and report	
	bribery and corruption?	
31	Does the Entity have an enterprise wide programme that	Yes
	sets minimum ABC standards?	
32	Has the Entity appointed a designated officer or officers	L.
	with sufficient experience/expertise responsible for	Yes
	coordinating the ABC programme?	<u> </u>
33	Does the Entity have adequate staff with appropriate	Von
	levels of experience/expertise to implement the ABC	Yes
34	programme? Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
34 35	Does the Entity have a global ABC policy that:	Bour part ventures and third parties acting on benair of the Entity
35 a	Prohibits the giving and receiving of bribes? This	
33 a	includes promising, offering, giving, solicitation or	ļ
	receiving of anything of value, directly or indirectly, if	Yes
	improperty intended to influence action or obtain an	
	advantage	
35 b	Includes enhanced requirements regarding interaction	Yes
	with public officials?	Yes
35 c	Includes a prohibition against the falsification of books	
	and records (this may be within the ABC policy or any	
	other policy applicable to the Legal Entity)?	Yes
	Door the Entity have controls in along to monitor the	
36	Does the Entity have controls in place to monitor the	Yes
37	effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular	
31	poos the boath receive, assess, and challenge regular	Yes
	reporting on the status of the ABC programme?	1.50
20	reporting on the status of the ABC programme?	
38	Has the Entity's ABC Enterprise Wide Risk Assessment	
38		Yes
	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	
38 38 a	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was	
	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was	
	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was	Yes
	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was	Yes
38 a	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed.	Yes
38 a	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes n/a
38 a	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity ABC EWRA cover the inherent risk	Yes n/a
38 a 39	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes n/a
38 a	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other	Yes n/a Yes
38 a 39 40 40 a	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate	Yes n/a
38 a 39	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and	Yes n/a Yes Yes
38 a 39 40 40 a	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Comption risks associated with the countries and industries in which the Entity does business, directly	Yes n/a Yes
38 a 39 40 40 a 40 b	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes n/a Yes Yes
38 a 39 40 40 a	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those	Yes Yes Yes Yes
38 a 39 40 40 a 40 b	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those that involve state-owned or state-controlled entities or	Yes Yes Yes Yes
38 a 39 40 40 a 40 b	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate. Comuption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries. Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes Yes Yes Yes
38 a 39 40 40 a 40 b	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate. Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries. Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials Corruption risks associated with gifts and hospitality,	Yes Yes Yes Yes Yes
38 a 39 40 40 a 40 b	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate. Comuption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries. Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes Yes Yes Yes

	Ohanna is husiness activities that may materially	
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a		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 and the standard and the same standard and the stan	No
42 f	Non-employed workers as appropriate (contractors/consultants)	No
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	n/a
45	If appropriate, provide any additional information/context to the answers in this section.	n/a
5 AMI C	TF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 C	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least	Yes
	annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	No
48 a1	If Y, does the Entity retain a record of the results?	Not Applicable
48 b	EU Standards	No
48 b1	If Y, does the Entity retain a record of the results?	Not Applicable
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes

CBDDQ V1.4

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come reasons that applies across the entity, including for forest hardening and control to to identify and handle come reasons if they send to re-establish across reasons are control to the come and t	40 k		
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relationship 48 m			Yes
49 m Outline the processes regarding for southing screening for smiter document within defense a risk business? 50 Has the Entity defined a risk tolerance statement or smiter document within defense a risk business? 51 a If y what is the retention period? 52 Confirm that all responses provided in the above Section are reasossariative of all the LE's branches if y we save social search of the branches that supplies to a response search of the branches that supplies to a response sprovided in the above Section are reasossariative of all the LE's branches if N. darky which questions the difference's relate to any social search of the branches that supplies to a response sprovided in the above Section are reasossariative of all the LE's branches if N. darky which questions the difference's relate to any social search of the branches that supplies to your social response to the branches that supplies to your social response to the branches that supplies to your social response to the answers in this section. 52 a If appropriate, provide any additional information/content to the answers in this section. 63 a If appropriate, provide any additional information/content and the answers in this section. 64 a Client SAMCTIONS RISK ASSESSMENT 65 a Client Ves 65 b Product Ves 65 c Per Product Ves 65 c Per Product Ves 65 c Per Identification Ves 65 d Transaction Screening against Adverse Media/Negative Aves 65 d Clean the Entity AMIL & CIT EV/RA been completed			
senctions, PEPs and Aqueren Media/Negative News 4			
49 n Outline the processes for the maintenance of internal Ves Varieties. 50 Outline the processes for the maintenance of internal Ves with processes for the maintenance of internal Ves similar document with defines a risk boundary around their business? 51 Obes the Entity have record retention procedures that comby with applicable laws? 52 a Confirm that all responses provided in the above Section are representable of all the LE's branches. 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. 63 AML CIF & SANCTIONS RISK ASSESSMENT 64 Does the Entity's AML & CIF EWRA cover the inherent filt. 64 Does the Entity's AML & CIF EWRA cover the controls of the answers in this section. 65 A Comment of the Com	49 m		Von
watchister Has the Entity defined a risk tolerance statement or similar document which define a risk boundary around their business? Does the Entity defined a risk boundary around their business? Does the Entity Amal of the Entity and their business? Ty what is the retention period? **Yes** **Syears or more** **Syears or more** **Syears or more** **Confirm that all responses provided in the above Section are representative of all the LES branches are the branchies that this applies to. If appropriate, provide any additional information/context to the answers in this section. **SAMIL, CITE a SANCTIONS RISK ASSESSMENT** **SANCTIONS RISK ASSESSMENT** **Does the Entity's AML & CITE EVRA cover the interent that section are commendations. **SAMIL, CITE a SANCTIONS RISK ASSESSMENT** **SA Commoners dealled below:** **Perioduct** **Perioduct** **Ves** **SA Commoners dealled below:** **Ves** **SA Commoners dealled below:*		sanctions, PEPs and Adverse Media/Negative News	165
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Has the Entity defined a risk bloenace statement or smilar document with defines a risk burnday around their business? 1 Does the Entity have record referition procedures that common with applicable laws? 1 If, what is the retention procedure. 2 Confirm that all responses provided in the above Section are recreasefulty of lath BLES branches. 3 are recreasefulty of lath BLES branches. 3 If appropriate, provide any additional information/context to the answers in this section. 4 Pappropriate, provide any additional information/context to the answers in this section. 5 ANL/CFT politices and procedures are closely linked to the Financial Action Task Force (FATF) recommendations 5 ANL/CFT politices and procedures are closely linked to the Financial Action Task Force (FATF) recommendations 5 ANL/CFT a SANCTIONS RISK ASSESSMENT 5 Commonents detailed below. 5 ANL COMMONENT SET ASSESSMENT 5 Commonents detailed below. 5 AND Product Yes 5 Commonents detailed below. 7 AND Product Yes 5 Like the Entity's ANIL A CTF EWRA boen completed in the second of the product Yes 5 Commonents detailed below	43 11		Yes
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effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 a 55 f 55 a 57 b 57 a 57 b 57 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 b 55 a 55 b 55 d 55 c 55 d 55 a 55 d 55 a 55 d 55 a 55 d 55 a 55 d 5	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 b 55 a 55 b 55 d 55 c 55 d 55 a 55 d 55 a 55 d 55 a 55 d 55 a 55 d 5	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	Yes
58 c List Management Yes	54 a 54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 f 55 d 55 f 55 g 55 h 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
	54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 a 55 f 55 c 57 a 57 a 57 c 57 d 58 a 58 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
FO. 1 Management Information Voc	54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes
58 d Management Information Yes	54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 d 55 c 6 55 c 6 55 d 55 c 55 d 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance List Management	Yes

58 e		Yes
58 f	Transaction Screening	Yes
58 g		Yes
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA was completed.	n/a
60	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	n/a
61	If appropriate, provide any additional information/context to the answers in this section.	n/a
7. KYC,	SDD and EDD	
62		Yes
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes
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:	Van
65 a	Ultimate beneficial ownership	Yes Yes
65 a1	Are ultimate beneficial owners verified? Authorised signatories (where applicable)	Yes
65 b	Key controllers	Yes
65 c 65 d	Other relevant parties	No
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	25%
67	Does the due diligence process result in customers receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information Other (specify)	Yes
67 a6	Outer (specify)	n/a
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4	Other 15 110 th of the	No
68 a4a	If yes, please specify "Other"	n/a
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes
69 a	If Y, is this at:	
03 a		
69 a1 69 a2	Onboarding KYC renewal	Yes Yes

		IC.
69 a3 70	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	Yes
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	We confirm that the KYC update schedule depends on the date of the previous update and the client's risk level (high risk - once a year, medium risk - once every 3 years, low risk - once every 5 years)
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	EDD on risk-based approach
76 b	Respondent Banks	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	Prohibited
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	EDD on risk-based approach
76 i	Non-account customers	EDD on risk-based approach
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	EDD on risk-based approach
76	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	Do not have this category of customer or industry
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
76 y	Other (specify)	n/a
77	If restricted, provide details of the restriction	Not applicable
78	Does EDD require senior business management and/or compliance approval?	Yes

78 a	If Y indicate who provides the approval:	Senior business management
79	Does the Entity have specific procedures for onboarding	Solid Statistics Hallage Held
	entities that handle client money such as lawyers, accountants, consultants, real estate agents?	No
80	Does the Entity perform an additional control or quality 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	n/a
82	If appropriate, provide any additional information/context to the answers in this section.	79: The general due diligence procedures/enhanced due diligence measures are applied, taking into account the risk-based approach
8. MONI	TORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	Transactions that do not correspond to the client's financial condition and/or nature of business, and contain other indicators of suspicious activity, are detected automatically and manually. Further analysis of the transaction and/or client activity is performed by the department's staff.
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?	Lime Systems
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 suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a	Yes
90	timely manner? 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	n/a
91	If appropriate, provide any additional information/context to the answers in this section.	84: In the manual mode, suspiciousness indicators related to the client's activities or behavior that cannot be automated are detected.
9. PAYM	IENT TRANSPARENCY	。 第一章
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		Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	The Laws of Ukraine "On prevention and counteraction to legalization (laundering) of proceeds of crime, terrorist financing and financing of proliferation of weapons of mass destruction", "On banks and banking"; "Regulations on financial monitoring by banks" of the NBU and other.
93 c	If N, explain	
94	border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include	Yes
96	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	n/a
97	If appropriate, provide any additional information/context to the answers in this section.	n/a
Les Carres	AND THE RESERVE OF THE PROPERTY OF THE PROPERT	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions	Automated
102 a	screening? If 'automated' or 'both automated and manual'	
102 e4	selected: Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1 102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Lime Systems
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Automated
105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its	
106 a	consolidated United Nations Security Council	Used for screening customers and beneficial owners and for filtering transactional data
106 b	Sanctions List (UN) United States Department of the Treasury's Office of	Used for screening customers and beneficial owners and for filtering transactional data
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data

106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Not used
106 f	Other (specify)	The list of persons associated with terrorist activities or subject to international sanctions, approved by the State Financial Monitoring Service of Ukraine and including information from the UN list. Sanctions lists of the National Security and Defense Council of Ukraine.
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	n/a
110	If appropriate, provide any additional information/context to the answers in this section.	106e: The Bank is in the process of implementing Canada's sanctions lists
11. TRAIN	ING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to :	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
112 f	Non-employed workers (contractors/consultants)	Not Applicable
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Other
115	Confirm that all responses provided in the above Section	Yes

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.	114a: monthly, in accordance with the approved training plan 111f: in this case, "fraud" refers to attempts by the client or his representative to provide false information to the bank or to provide information with the aim of misleading the bank
12. QUAL	ITY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality	
	Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes
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.	n/a
120	If appropriate, provide any additional information/context to the answers in this section.	n/a
13. AUDIT		
121	In addition to inspections by the government	
121	supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
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	Yearly
123	Does the internal audit function or other independent third	
123 a	party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and	Yes
	procedures	res
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
123 i	Transaction Monitoring	Yes
123 j	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 completeness?	Yes
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 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
44 === :		
14. FRAI	Does the Entity have policies in place addressing fraud	Yes
120	risk? Does the Entity have a dedicated team responsible for	
128	preventing & detecting fraud?	Yes

129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	n/a
132	If appropriate, provide any additional information/context to the answers in this section.	n/a

Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)
Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)

JSB 'UKRGASBANK' (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

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, RODION MOROZOV/Ading Chairperson of the Management Board 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.

, RADZHAM DZHAN (Head of Financial Monitoring Department, CCO, AMLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete

___ (Signature & Date) 29 September 2025

(Signature & Date) 29 September 2025