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.) in predicting this fifteent than its Entitly Head Office, a separate questionnaire as the completed for that branch

No#	Question	Answer
parameter and the same of the	& OWNERSHIP	
1	Full Legal Name	
		PUBLIC JOINT-STOCK COMPANY JOINT STOCK BANK 'UKRGASBANK' (JSB 'UKRGASBANK')
2	Append a list of foreign branches which are covered by this questionnaire	JSB 'UKRGASBANK' does not have foreign branches. The list of domestic branches, please find by the following link: https://www.ukrgasbank.com/contacts/offices/
3	Full Legal (Registered) Address	1, Yerevanska str., Kyiv, 03087, Ukraine
4	Full Primary Business Address (if different from above)	19,21,23 Staronavodnytska, str. Kyiv, 01015, Ukraine
5	Date of Entity incorporation/establishment	July 21, 1993
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	n/a
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	Yes
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	n/a
7	% of the Entity's total shares composed of bearer shares	JSB "UKRGASBANK" does not issue bearer shares.
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	nla
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	The National Bank of Ukraine
11	Provide Legal Entity Identifier (LEI) if available	254900M9927XDGPXJ562
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	n/a
13	Jurisdiction of licensing authority and regulator of ultimate parent	n/a
14	Select the business areas applicable to the Entity	

(min) and (min)		
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	Yes
14 h	Broker/Dealer	Yes
The second secon		
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	
		n/a
15	Does the Entity have a significant (10% or more) portfolio	
400	of non-resident customers or does it derive more than	
	10% of its revenue from non-resident customers? (Non-	
	resident means customers primarily resident in a different	No
	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
16	Select the closest value:	
16 a	Number of employees	1001-5000
16 b	Total Assets	Between \$100 and \$500 million
17	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches.	res
17 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
		n/a
-		
18	If appropriate, provide any additional information/context	
	to the answers in this section.	
		n/a
2 PRODE	UCTS & SERVICES	
19	Does the Entity offer the following products and services:	
10	boes the Entity offer the following products and services,	
19 a	Correspondent Banking	Yes
19 a1	If Y	100
19 a1a		The second secon
19 414	Does the Entity offer Correspondent Banking	Yes
19 a1b	services to domestic banks?	
10 010	Does the Entity allow domestic bank clients to provide downstream relationships?	No
19 a1c	Does the Entity have processes and procedures in	
10 416	place to identify downstream relationships with	Yes
	domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking	
	services to foreign banks?	Yes
19 a1e	Does the Entity allow downstream relationships	
12 416	with foreign banks?	No .
19 a1f	Does the Entity have processes and procedures in	
	place to identify downstream relationships with	Yes
		1 502
19 a1g	foreign banks? Does the Entity offer Correspondent Banking	
10 alg	services to regulated Money Services Businesses	No.
		INO INO
	(MSBs)/Money Value Transfer Services (MVTSs)?	
19 a1h	Does the Entity allow downstream relationships	
	with MSBs, MVTSs, or Payment Service Provider	
	(PSPs)?	
19 a1h1		No
19 a1h2		No
19 a1h3	PSPs	No
19 a1h2	MSBs MVTSs	No

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Sale of Monetary Instruments If yes, state the applicable level of due diligence identification and Verification If 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 Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. SB'UKRGASBANK' has an Agency Agreement on participation in payment systems. The Bank has no unregulated MSB and MVTS clients (clients are payment and/or financial services providers, licensed and entered in the regulator's register, comply with AML/CFT legislation). CTF & 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 Beneficial Ownership Yes Cash Reporting Yes Per Screening Yes	19 p3		
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	20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e	Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. 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. 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. If appropriate, provide any additional information/context to the answers in this section.	Yes n/a JSB 'UKRGASBANK' has an Agency Agreement on participation in payment systems. The Bank has unregulated MSB and MVTS clients (clients are payment and/or financial services providers, license entered in the regulator's register, comply with AML/CFT legislation). Yes Yes Yes Yes Yes Yes
Vac	20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 j	Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. 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. 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. 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 applies to the answers in the answers in this applies to the answers in the answers in the answers in the applies to the answers in th	Yes n/a JSB 'UKRGASBANK' has an Agency Agreement on participation in payment systems. The Bank has no unregulated MSB and MVTS clients (clients are payment and/or financial services providers, licensed and entered in the regulator's register, comply with AML/CFT legislation). Yes Yes Yes Yes Yes Yes Yes Ye

	-	
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.	11-100
	CTF & Sanctions Compliance Department?	11-100
24	Is the Entity's AML, CTF & Sanctions policy approved at	
	least annually by the Board or equivalent Senior	
	Management Committee? If N, describe your practice in	Yes
	Question 29.	
25	Does the Board receive, assess, and challenge regular	
20	reporting on the status of the AML, CTF, & Sanctions	Yes
	programme?	
26	Does the Entity use third parties to carry out any	
	components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	
		n/a
27	Does the entity have a whistleblower policy?	Yes
27	Confirm that all responses provided in the above Section	
28	are representative of all the LE's branches	Yes
00 -	If N, clarify which questions the difference/s relate to	
28 a	and the branch/es that this applies to.	
	and the branchies 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
		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
4. ANTI BE	RIBERY & 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?	7.55
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 experience/expertise to implement the ABC	Yes
	programme?	
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This	
	includes promising, offering, giving, solicitation or	
	receiving of anything of value, directly or indirectly, if	Yes
	improperly intended to influence action or obtain an	
	advantage	
35 b	Includes enhanced requirements regarding interaction	Yes
	with public officials?	165
35 c	Includes a prohibition against the falsification of books	
	and records (this may be within the ABC policy or any	
	other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to monitor the	Yes
	effectiveness of their ABC programme?	
37	Does the Board receive, assess, and challenge regular	Yes
	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	
00 0	completed.	
	33	n/a
39	Does the Entity have an ABC residual risk rating that is	L
	the net result of the controls effectiveness and the	Yes
	inherent risk assessment?	
40	Does the Entity's ABC EWRA cover the inherent risk	
	components detailed below:	
40 a	Potential liability created by intermediaries and other	Yes
	third-party providers as appropriate	
40 b	Corruption risks associated with the countries and	L.
	industries in which the Entity does business, directly	Yes
	or through intermediaries	
40 c	Transactions, products or services, including those	
	that involve state-owned or state-controlled entities or	Yes
	public officials	
40 d	Corruption risks associated with gifts and hospitality,	
	hiring/internships, charitable donations and political	Yes
	contributions	

40 -	Changes in business activities that may materially	
40 e	increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other	
	independent 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	Not Applicable
42 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable
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
		110
45	If appropriate, provide any additional information/context	
	to the answers in this section.	
		n/a
E AMIL (CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
40	consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent,	
	detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least annually?	Yes
48	Has the Entity chosen to compare its policies and	
	procedures against:	
48 a	U.S. Standards	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	Yes
49 c	unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide	V .
	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

49 i		
431	Define the process for escalating financial crime risk	
		Voc
	issues/potentially suspicious activity identified by	Yes
	employees	
49 j	Define the process, where appropriate, for terminating	
10]	existing customer relationships due to financial crime	Yes
		1.00
	risk	
49 k	Define the process for exiting clients for financial	
	crime reasons that applies across the entity, including	Yes
	foreign branches and affiliates	
40.1	Define the process and controls to identify and handle	
49 I		
	customers that were previously exited for financial	Yes
	crime reasons if they seek to re-establish a	1.00
	relationship	
49 m	Outline the processes regarding screening for	
43 111		Yes
	sanctions, PEPs and Adverse Media/Negative News	1.55
49 n	Outline the processes for the maintenance of internal	
43 11		Yes
	"watchlists"	
50	Has the Entity defined a risk tolerance statement or	
	similar document which defines a risk boundary around	Yes
	their business?	
51	Does the Entity have record retention procedures that	
31		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	
32	are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
		n/a
53	If appropriate, provide any additional information/context	
33		
	to the answers in this section.	48a: AML/CFT policies and procedures are closely linked to the Financial Action Task Force (FATF)
		recommendations
	· ·	recommendations
		recommendations
6 AML CT	FE & SANCTIONS RISK ASSESSMENT	recommendations
	F & SANCTIONS RISK ASSESSMENT	recommendations
6. AML, CT	Does the Entity's AML & CTF EWRA cover the inherent	recommendations
		recommendations
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	recommendations
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes
54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Yes Yes
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Yes Yes
54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Yes Yes
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes Yes Yes
54 a 54 b 54 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	Yes Yes Yes
54 a 54 b 54 c 54 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:	Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 55 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	Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 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	Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 a 55 b	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	Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 d 55 a 55 b 55 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	Yes
54 a 54 b 54 c 54 d 55 d 55 a 55 b 55 c 55 d	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	Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 d 55 a 55 b 55 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	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 e	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	Yes
54 a 54 b 54 c 54 d 55 d 55 a 55 b 55 c 55 d	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	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 e	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	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g	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	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	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	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g	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	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	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	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g 55 h 56	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?	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	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	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g 55 h 56	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?	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g 55 h 56	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	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g 55 h 56	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	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56	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.	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g 55 h 56	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	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56	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.	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 f 55 g 55 h 56 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:	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 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	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 c 55 d 55 c 55 f 55 g 55 h 56 a 57 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	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 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	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 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	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 f 55 g 55 h 56 a 57 a 57 a 57 a 57 c 57 d	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
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 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	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 f 55 g 55 h 56 a 57 a 57 a 57 a 57 c 57 d	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 c 55 c 55 d 55 c 55 f 55 g 55 h 56 a 57 a 57 a 57 b 57 c 57 d 58	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
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 c 57 a 57 c 57 d 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
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 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: Customer Due Diligence Governance	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 c 55 d 55 e 55 f 56 a 57 a 57 a 57 a 57 a 57 b 57 c 57 c 57 d 58 a 58 a 58 b 58 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 Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance List Management	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 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: Customer Due Diligence Governance	Yes

59 -	Name Screening	V _Q c
58 e 58 f	Transaction Screening	Yes Yes
58 g	Training and Education	Yes
59 S	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
		TVA
60	Confirm that all responses provided in the above Section	Yes
-	are representative of all the LE's branches	165
60 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	n/a
		170
61	If appropriate, provide any additional information/context	
	to the answers in this section.	n/a
		TVA
7. KYC, (CDD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	V
	CDD must be completed, e.g. at the time of onboarding	Yes
64	or within 30 days? Which of the following does the Entity gather and retain	
04	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 Are each of the following identified:	Yes
65 65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied	25%
	to beneficial ownership identification?	20%
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	
01 a	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	
		n/a
60	For high rick non-individual quatement, is a site visit 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	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
<u> </u>	If V is this st	
69 a	If Y, is this at: Onboarding	Yes
69 a1 69 a2	KYC renewal	Yes
03 aZ	1 101010101	

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	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
761	Nuclear power	EDD on risk-based approach
76 m	Payment Service Providers	EDD on risk-based approach
76 n	PEP Close Associates	EDD on risk-based approach
76 o	PEP Close Associates PEP Related	EDD on risk-based approach
76 p		EDD on risk-based approach
76 q	Red light businesses/Adult entertainment	Do not have this category of customer or industry
76 r 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	Prohibition on establishing business relations and conducting financial transactions
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 entities that handle client money such as lawyers,	N-
	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	Yes
81 a	are representative of all the LE's branches If N, clarify which questions the difference/s relate to	
or a	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
	ORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting	Yes
	of suspicious activity?	
84	What is the method used by the Entity to monitor	Combination of automated and manual
84 a	transactions for suspicious activities? If manual or combination selected, specify what type	
84 a	of transactions are monitored manually	Transactions that do not correspond to the financial condition and/or nature of the client's business are
	,	detected/verified manually. The Bank has an integrated system for automatic detection of suspicious
		transactions/client activity (alert, rank analysis).
84 b	If automated or combination selected, are internal	Vendor-sourced tools
	system or vendor-sourced tools used?	Vender-Sourced tools
84 b1	If "Vendor-sourced tool" or 'Both' selected, what is the name of the vendor/tool?	
	the hame of the vendo//tool:	Lime Systems
84 b2	When was the tool last updated?	<1 year
84 b3	When was the automated Transaction Monitoring	<1 year
	application last calibrated?	- Tyour
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	Yes
86	reporting requirements? Does the Entity have policies, procedures and processes	
00	to review and escalate matters arising from the	Yes
	monitoring of customer transactions and activity?	
87	Does the Entity have a data quality management	V
	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	
.000	Request For Information (RFIs) from other entities in a	Yes
89	timely manner? Does the Entity have processes in place to send	
09	Requests for Information (RFIs) to their customers in a	Yes
-	timely manner?	
90	Confirm that all responses provided in the above Section	Yes
90 a	are representative of all the LE's branches If N, clarify which questions the difference/s relate to	
50 u	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.
0 0 110	THE TRANSPARENCY	
92 92	ENT TRANSPARENCY Does the Entity adhere to the Wolfsberg Group Payment	I.
32	Transparency Standards?	Yes

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	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 or financial monitoring by banks" of the NBU and other.
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section	Yes
00 -	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
10. SANC	TIONS	
98	Does the Entity have a Sanctions Policy approved by	
30	management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Automated
102 a	If 'automated' or 'both automated and manual'	
102 a1	selected: Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	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	sanctions screening processes: Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106 b	United States Department of the Treasury's Office of	Used for screening customers and beneficial owners and for filtering transactional data
	Foreign Assets Control (OFAC)	and to the second 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. 2. 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	IING & 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 are representative of all the LE's branches	Yes

115 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
		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
12. QUALI	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality	
		Yes
	the independent Audit function)?	
118	Does the Entity have a program wide risk based	
110	Compliance Testing process (separate from the	Yes
	independent Audit function)?	
119	Confirm that all responses provided in the above Section	
119	are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to	
119 a	and the branch/es that this applies to.	
	and the branchies 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	
	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,	Yes
	Fraud and Sanctions policies and practices on a regular	
400	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	
	party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and	
. = 0	procedures	Yes
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	Other (specify)	
. 201	()/	
	}	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	
123	are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to	
. 2.5 a	and the branch/es that this applies to.	
	and the orangeres that this applies to.	n/a
126	If appropriate, provide any additional information/context	
	to the answers in this section.	
	to allowed in the deciding	n/a
14. FRAI	JD	
127	Does the Entity have policies in place addressing fraud	
141		Yes
128	risk?	
128	Does the Entity have a dedicated team responsible for	Yes
128		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 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, RODION MOROZOV (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 nonest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution. complete and correct to

, MARIIA ALIEKSIEIE), 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 author ed to execute this declaration on behalf of the Financial Institution.

(Signature & Date) October 25, 2024

(Signature & Date) October 25, 2024