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

the Wolfsberg Group

Financial Institution Name: Location (Country) :

Credit Europe Bank (Suisse) S.A. Switzerland

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer
	& OWNERSHIP	Answer
1	Full Legal Name	
	i ui Legai Naine	Credit Europe Bank (Suisse) S.A.
2	Append a list of foreign branches which are covered by this questionnaire	Not applicable. The bank does not have any branches or subsidiaries.
3	Full Legal (Registered) Address	80, rue du Rhône, 1204 Geneva, Switzerland
4	Full Primary Business Address (if different from above)	Same as above.
5	Date of Entity incorporation/establishment	10.11.1987
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 No
6 c	Government or State Owned by 25% or more	No 🔽
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	Direct shareholder: 100% Credit Europe Bank N.V. (Amsterdam) UBO: Mr. Husnu OZYEGIN
	% of the Entity's total shares composed of bearer shares	None
	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No 🔻
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	N/A
	Does the Bank have a Virtual Bank License or provide services only through online channels?	No 🔻
10	Name of primary financial regulator/supervisory authority	Swiss Financial Market Supervisory Authority (FINMA)
11	Provide Legal Entity Identifier (LEI) if available	529900AK7KUKTAXLBD22
	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	FIBA HOLDING A.S.

13		
	Jurisdiction of licensing authority and regulator of	Turkey, not subject to license.
	ultimate parent	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	No
14 b	Private Banking	No Yes
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes No Yes Yes Yes No No No No
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	No .
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	N/A
l		
l		
15	Does the Entity have a significant (10% or more)	
	portfolio of non-resident customers or does it derive	
	more than 10% of its revenue from non-resident	Yes
	customers? (Non-resident means customers primarily	les l
	resident in a different jurisdiction to the location	
	where bank services are provided)	
15 a	If Y, provide the top five countries where the non-	About 25% resident in Turkey and others are less than 10%.
	resident customers are located.	About 25 /6 resident in Turkey and others are less than 10 /6.
16	Select the closest value:	
16 a	Number of employees	51-200
16 b	Total Assets	(A)(1)(A)(A)(A)(A)(A)(A)(A)(A)(A)(A)(A)(A)(A)
17		Greater than \$500 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	No branches
	•	
17 a	If N, clarify which questions the difference/s relate to	N/A
	and the branch/es that this applies to.	
18	If appropriate, provide any additional	N/A
18	If appropriate, provide any additional information/context to the answers in this section.	N/A
18		N/A
18		N/A
500000	information/context to the answers in this section.	N/A
500000	information/context to the answers in this section. CTS & SERVICES	N/A
2. PRODU	information/context to the answers in this section.	N/A
2. PRODU	information/context to the answers in this section. CTS & SERVICES Does the Entity offer the following products and	N/A Yes
2. PRODU 19	information/context to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services:	
2. PRODU 19 19 a 19 a	information/context to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y	Yes
2. PRODU 19	information/context to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking	
2. PRODU 19 19 a 19 a	information/context to the answers in this section. CTS & 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
2. PRODU 19 19 a 19 a 19 a1 19 a1a	information/context to the answers in this section. CTS & 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. PRODU 19 19 a 19 a1 19 a1a 19 a1b	information/context to the answers in this section. CTS & 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 No
2. PRODU 19 19 a 19 a 19 a1 19 a1a	information/context to the answers in this section. CTS & 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	Yes No No
2. PRODU 19 19 a 19 a1 19 a1a 19 a1b	information/context to the answers in this section. CTS & 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	Yes No
2. PRODU 19 19 a 19 a1 19 a1a 19 a1b 19 a1c	information/context to the answers in this section. CTS & 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?	Yes No No
2. PRODU 19 19 a 19 a1 19 a1a 19 a1b	information/context to the answers in this section. CTS & 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	Yes No No
2. PRODU 19 19 a 19 a1 19 a1a 19 a1b 19 a1c	information/context to the answers in this section. CTS & 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?	Yes No No No
2. PRODU 19 19 a 19 a1 19 a1a 19 a1b 19 a1c	information/context to the answers in this section. CTS & 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	Yes No No No
2. PRODU 19 19 a 19 a 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d	information/context to the answers in this section. CTS & 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?	Yes No No No Yes
2. PRODU 19 19 a 19 a1 19 a1a 19 a1b 19 a1c	information/context to the answers in this section. CTS & 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	Yes No No No Yes
2. PRODU 19 19 a 19 a 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d	information/context to the answers in this section. CTS & 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	Yes No No No Yes
2. PRODU 19 19 a 19 a 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f	information/context to the answers in this section. CTS & 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?	Yes Solve So
2. PRODU 19 19 a 19 a 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d	information/context to the answers in this section. CTS & 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 identify downstream relationships with foreign banks?	Yes Solve So
2. PRODU 19 19 a 19 a 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1e 19 a1f	information/context to the answers in this section. CTS & 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 downstream relationships with foreign banks? Does the Entity forer Correspondent Banking services to identify downstream relationships with foreign banks?	Yes Solve So
2. PRODU 19 19 a 19 a 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1e 19 a1f	information/context to the answers in this section. CTS & 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 identify downstream relationships with foreign banks?	Yes No No No Yes Yes Yes Yes
2. PRODU 19 19 a 19 a 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1e 19 a1f	information/context to the answers in this section. CTS & 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 downstream relationships with foreign banks? Does the Entity forer Correspondent Banking services to identify downstream relationships with foreign banks?	Yes No No No Yes Yes Yes Yes
2. PRODU 19 19 a 19 a 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1e 19 a1f	information/context to the answers in this section. CTS & 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 downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services 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)?	Yes No No No Yes Yes Yes Yes
2. PRODU 19 19 a 19 a 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1e 19 a1f	information/context to the answers in this section. CTS & 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	Yes No No No Yes Yes Yes Yes
2. PRODU 19 19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1e 19 a1f	information/context to the answers in this section. CTS & 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)?	Yes No No No Yes No Yes No Yes No
2. PRODU 19 19 a 19 a 19 a1a 19 a1b 19 a1c 19 a1d 19 a1f 19 a1f 19 a1f 19 a1f 19 a1g	information/context to the answers in this section. CTS & 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 No No No Yes No Yes No No You have the second of the second
2. PRODU 19 19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1e 19 a1f	information/context to the answers in this section. CTS & 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)?	Yes No No No Yes No Yes No Yes No

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	No -
19 b	Cross-Border Bulk Cash Delivery	No E
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	No -
19 e	Hold Mail	No E
19 f	International Cash Letter	No E
2000	Low Price Securities	
19 g		No 🛌
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	Yes
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	No
19 i3	Virtual Asset Service Providers (VASPs)	No 🗀
19 i4	eCommerce Platforms	No —
19 i5	Other - Please explain	
13 13	Circi - Fredse explain	N/A
19 j	Private Banking	No 🗀
19 k	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No -
19 n	Trade Finance	1000
200 200		Yes
19 o	Virtual Assets	No
19 р	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	No 🗔
19 p1a	If yes, state the applicable level of due diligence	Please select
19 p2	Wire transfers	No -
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p2a	Foreign currency conversion	
19 p3 19 p3a	If yes, state the applicable level of due diligence	Name of the second seco
		Please select
19 p4	Sale of Monetary Instruments	No 🗀
19 p4a	If yes, state the applicable level of due diligence	Please select
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	N/A
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	No branches
20 a	If N, clarify which questions the difference/s relate to	N/A
	and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	Q19a1e: The bank offers correspondant banking services to 3 group banks only.
3. AMI C	TF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum	
	AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient	Yes
22 b	Adverse Information Screening	Yes
22 c	Beneficial Ownership	Yes
22 d	Cash Reporting	Yes
2 e	CDD	0. 54-55
200 220		Yes
2 f	EDD	
2 g	Independent Testing	Yes
2 h	Periodic Review	Yes
2 i	Policies and Procedures	Yes
2 j	PEP Screening	Yes
2 k	Risk Assessment	Yes
21	Sanctions	
- 1	Garioudila	Yes

22 m	Suspicious Activity Reporting	Yes	Sec.
22 n	Training and Education	Yes	7000
22 o	Transaction Monitoring	Yes	
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	1-10	-
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 Question 29.	Yes	•
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes	-
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No	-
26 a	If Y, provide further details	N/A	
27	Does the entity have a whistleblower policy?	Yes	
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches	-
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.	Q24. At each review date.	
4. ANTI	BRIBERY & CORRUPTION		100
30	Has the Entity documented policies and procedures		
	consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes	-
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes	•
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes	•
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes	•
34	Is the Entity's ABC programme applicable to:	Not Applicable	-
35	Does the Entity have a global ABC policy that:		
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes	•
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes	-
35 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes	•
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes	-
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes	-
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes	~
38 a	If N, provide the date when the last ABC EWRA was completed.	N/A	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes	•
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes	V
	Potential liability created by intermediaries and		_

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes	•
40 с	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes	•
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes	•
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	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	lament of
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	No branches	-
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.		
5. AML, C	TF & SANCTIONS POLICIES & PROCEDURES		100
46	Has the Entity documented policies and procedures		Committee
	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?	No	•
48	Has the Entity chosen to compare its policies and procedures against:		
48 a	U.S. Standards	Yes	
48 a1	If Y, does the Entity retain a record of the results?	Yes	
48 b	EU Standards	Yes	
48 b1	If Y, does the Entity retain a record of the results?	Yes	
49	Does the Entity have policies and procedures that:		
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes	-
49 Ь	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	言
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes	-
49 f	Prohibit opening and keeping of accounts for	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	-

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49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes	•
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes	•
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes	•
49	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes	•
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes [•
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes	•
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes	•
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes	•
51 a	If Y, what is the retention period?	5 years or more	•
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches	~
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	Q47: Policies and procedure are updated at least every two years if there is no need to update	
	information/context to the answers in this section.	earlier.	
6. AML. CT		earlier.	
6. AML, CT 54	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	earlier.	
54 54 a	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes L	
54 a 54 b	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Yes L	
54 a 54 b 54 c	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Yes I I Yes Yes I I I I I Yes I I I I I I I I I I I I I I I I I I I	
54 a 54 b	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Yes L	
54 a 54 b 54 c 54 d 55 d	F & SANCTIONS RISK ASSESSMENT 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 I I Yes Yes I I I I I Yes I I I I I I I I I I I I I I I I I I I	
54 a 54 b 54 c 54 d 55 d 55 a 55 b	F & SANCTIONS RISK ASSESSMENT 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	
54 a 54 b 54 c 54 d 55 d 55 a 55 b 55 c	F & SANCTIONS RISK ASSESSMENT 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	F & SANCTIONS RISK ASSESSMENT 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 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d	F & SANCTIONS RISK ASSESSMENT 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	_
54 a 54 a 54 b 54 c 54 c 55 c 55 a 55 c 55 d 55 c 55 f	F & SANCTIONS RISK ASSESSMENT 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 Dilligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes	_
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58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	A STATE OF THE STA	
	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 are representative of all the LE's branches	No 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.	
7. KYC. C	CDD and EDD	
62	Does the Entity verify the identity of the customer?	
63		Yes
	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	
64 d	Ownership structure	Yes
64 e	Product usage	Yes Yes Yes Yes Yes Yes
350 10 000		res
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	
65 c		ALCO ALCO ALCO ALCO ALCO ALCO ALCO ALCO
	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	10%
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	Yes
67 a6	Other (specify)	Type of shares (bearer or nominative), complex ownership structure, no account with another FI, the entity is a new set-up, no economic substance in the country of registration, no economic activity
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	No 🗔
68 a3	Trigger event	Yes
68 a4	Other	No ==
68 a4a	If yes, please specify "Other"	
69 69 a	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? If Y, is this at:	Yes
69 a1	Onboarding	V
1-2001-1-100	ACCUPATION OF THE PROPERTY OF	Yes
69 a2	KYC renewal	Yes
	·	

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?	
	TOTAL DESIGNATION OF THE PROPERTY OF THE PROPE	
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	No
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	No =
74 a5	Trigger-based or perpetual monitoring reviews	No 🔻
74 a6	Other (Please specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Prohibited
76 b	Respondent Banks	EDD on risk-based approach
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	EDD on risk-based approach
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	100 (100) (100) (100) (100)
		EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	Prohibited
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	Prohibited
76 m	Payment Service Providers	
		Prohibited
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		Prohibited
76 s		EDD on risk-based approach
76 t		Prohibited
76 u	Travel and Tour Companies	Prohibited
76 v	Unregulated charities	Prohibited
76 w	Used Car Dealers	Prohibited
76 x	Virtual Asset Service Providers	Prohibited
76 y	Other (specify)	Entities established in jurisdictions not recognized by the international community are prohibited.
77	If restricted, provide details of the restriction	Correspondant banking services are restricted only to group banks.
78	Does EDD require senior business management and/ or compliance approval?	Yes

Does the Entity have acceled procedures for onboarding entities that additional control control and a sayona, accountable, consultants, rate adated agents? Yes 10 Oos the Entity perform an additional control or years a sayona, accountable, consultants, rate adated agents? Yes 11 a Entity perform an additional control or years and the Carbon and th	78 a	If Y indicate who provides the approval:	Both
soboarding entities that handle client money such as lavym, accountants, containts, and estate apreliants and estate appearance and estate appearance and estate appearance and estate and estate appearance and estate and estate appearance and estate and	S. Carriera		DOUIT
lawyers, accountains, consultants, real estate agents?	. 3		Vec
Does the Entity negrotion and additional control or quality review on clinicins supplies to EDD? Yes			
quality review on clients subject to EDD? Yes Yes Yes	80		
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Does the Entity adhere to the Wolfsberg Group	PAYME	NT TRANSPARENCY	
Voc		Does the Entity adhere to the Wolfsherg Group	
	5	Payment Transparency Standards?	Yes

93	Doos the Entity have policies assessment	
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	
93 b1	If Y, specify the regulation	Yes
33 51	ii i, specify the regulation	Swiss and Dutch regulatons.
93 с	If N, explain	N/A
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 are representative of all the LE's branches	No 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.	
10. SANC	TIONS	
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)?	Yes
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' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
02 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Swift screening and Imatch
02 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)	Other
03	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
04	What is the method used by the Entity?	Automated
	te access a relative personal para properties to the contract of the contract	0.1 **1.0*******************************

105	Does the Entity have a data quality management programme to ensure that complete data for all	Yes	-
106	transactions are subject to sanctions screening? Select the Sanctions Lists used by the Entity in its		
	sanctions screening processes:		
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for fillering 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 с	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	Used for screening customers and beneficial owners and for filtering transactional data	tion to d
106 f	Other (specify)	Swiss sanction list (SECO)	
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	No branches	~
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.	Q102 a2: CEB Suisse SA is using Worldcheck for sanction screening	
11. TRAININ	G & EDUCATION		177 8
111	Does the Entity provide mandatory training, which includes:		
111 a	Identification and reporting of transactions to government authorities	Yes	~
111 Ь	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes	•
I11 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes	~
l11 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes	-
111 e	Conduct and Culture	Yes	
11 f	Fraud	Yes	-
12	Is the above mandatory training provided to:		
12 a	Board and Senior Committee Management	Yes	
12 b	1st Line of Defence	Yes	
12 c 12 d	2nd Line of Defence 3rd Line of Defence	Yes	M
12 a	Third parties to which specific FCC activities have been outsourced	Yes Not Applicable	-
12 f	Non-employed workers (contractors/consultants)	Not applicable	昌
13	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?		-
14	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes	~
	a to tente decision and the		
14 a	If Y, how frequently is training delivered?	Annually	
14 a 15		Annually No branches	

116	115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
Obes the Entity have a program wide risk based Oaulity Assurance programs for financial crime (separate from the independent Audit function)? 118 Obes the Entity have a program wide risk based Compilance Testing process (separate from the independent Audit function)? 119 Confirm that all responses provided in the above Section are representative of all the LES branches 119 a 117, Clarify which questions the differenced relate to and the branchies to the answers in this section. 120 If appropriate, provide any additional information/context to the answers in this section. 121 In addition to inspections by the government super-wisor-frequibition, does the Entity have an practices on a regular basis? 122 A word that is the Entity audited on its AML_CTF, ABC, Fraud and Sanctions programs by the following: 123 In Instant Audit Department 124 Instant Third Party 125 E same Third Party 126 Party over the following areas: 127 A word that the Audit function or other independent third party cover the following areas: 128 A KYC/CDD/EDD and underlying methodologies 129 A KYC/CDD/EDD and underlying methodologies 120 A Reporting Methodologies 120 A Reporting Methodologies 121 A Reporting Methodologies 122 A Reporting Methodologies 123 A Reporting Methodologies 124 A Reporting Methodologies 125 A Reporting Methodologies 126 Confirm that all responses provided in the above section are representative of all the LES branches section are representative of all the LES branc	116		
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fraud risk? Yes 128 Does the Entity have a dedicated team responsible		D	
		Does the Entity have policies in place addressing	Yes
not providing a detecting made:	128	Does the Entity have a dedicated team responsible for 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?	No V
131	Confirm that all responses provided in the above section are representative of all the LE's branches	No branches
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	
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)		
Every effort to	remain in full compliance with all applicable financial crime laws Institution understands the critical importance of having effective latory obligations.	on name) is fully committed to the fight against financial crime and makes s, regulations and standards in all of the jurisdictions in which it does business and holds accounts. The and sustainable controls to combat financial crime in order to protect its reputation and to meet its The granties to transactions in international payments and has adopted/is committed to adopting these
standards. The Financial The informatio The Financial	Institution further certifies it complies with / is working to complient in provided in this Wolfsberg CBDDQ will be kept current and with institution commits to file accurate supplemental information on (Global Head o	y with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. ###################################
I. CALDWELL Shirley (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.		
ILGUN Bulent / November 2023 (Signature & Date)		
CALDWELL Shirley / November 2023 (Signature & Date)		