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

the Wolfsberg Group

Financial Institution Name: Jordan International Bank Plc Location (Country) : United Kingdom

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

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	Jordan International Bank plc
2	Append a list of foreign branches which are covered by this questionnaire	N/A - JIB does not have branches
3	Full Legal (Registered) Address	Almack House 26-28 King Street London SW1Y 6QW
4	Full Primary Business Address (if different from above)	N/A
5	Date of Entity incorporation/establishment	1984
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	No V
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	0%
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No 🔻
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	N/A
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No 🔻
10	Name of primary financial regulator/supervisory authority	Financial Conduct Authority (FCA)
11	Provide Legal Entity Identifier (LEI) if available	13800WMLZ87OAYT3X87
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	Housing Bank for Trade and Finance - 75% Arab Jordan Investment Bank - 25%

1000	sdiction of licensing authority and regulator of	Central Bank of Jordan
ultim	nate parent	
14 Sele	ct the business areas applicable to the Entity	
	tail Banking	No .
	vate Banking	Yes
	mmercial Banking	Yes
DATABLE TO THE STATE OF THE STA	The second strike in the secon	M (80)
	ansactional Banking	Yes No
	restment Banking	
	ancial Markets Trading	Yes
14 g Sec	curities Services/Custody	No 🗆
14 h Bro	oker/Dealer	Yes
14 i Mu	Itilateral Development Bank	No
14 j We	ealth Management	No
	ner (please explain)	Trade Fiance
	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Structured Property Finance Mortgages
15 Does	s the Entity have a significant (10% or more)	
	folio of non-resident customers or does it derive	
	e than 10% of its revenue from non-resident	
	omers? (Non-resident means customers primarily	No T
	dent in a different jurisdiction to the location	
	re bank services are provided)	
	, provide the top five countries where the non-	N/A
res	sident customers are located.	
16 Selec	ct the closest value:	
	mber of employees	51-200
1000000 POUR	tal Assets	Greater than \$500 million
	firm that all responses provided in the above	Cicator trial \$500 million
	ion are representative of all the LE's branches.	Yes
	I, clarify which questions the difference/s relate to	N/A
and	d the branch/es that this applies to.	
18 If app	propriate, provide any additional	
Section No.	mation/context to the answers in this section.	
	magorinosmox to the unoversiting the section.	
2. PRODUCTS		
	s the Entity offer the following products and	
servi	ices:	
19 a Corre	espondent Banking	Yes
19 a1 If Y		
19 a1a D	oes the Entity offer Correspondent Banking	
	loes the Entity offer Correspondent Banking ervices to domestic banks?	No T
se	ervices to domestic banks?	No T
19 a1b D	ervices to domestic banks? Does the Entity allow domestic bank clients to	No No
19 a1b D	ervices to domestic banks? Does the Entity allow domestic bank clients to rovide downstream relationships?	
19 a1b D pr	ervices to domestic banks? Does the Entity allow domestic bank clients to rovide downstream relationships? Does the Entity have processes and procedures	No
19 a1b D pr 19 a1c D in	ervices to domestic banks? Does the Entity allow domestic bank clients to rovide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with	
19 a1b D pi	ervices to domestic banks? Does the Entity allow domestic bank clients to rovide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with omestic banks?	No
19 a1b D pri 19 a1c D in do 19 a1d D D	ervices to domestic banks? Does the Entity allow domestic bank clients to rovide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with omestic banks?	No Yes
19 a1b D pi 19 a1c D in do 19 a1d D	ervices to domestic banks? Does the Entity allow domestic bank clients to rovide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with omestic banks?	No
19 a1b D pi 19 a1c D ind dd 19 a1d D se	ervices to domestic banks? Does the Entity allow domestic bank clients to rovide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with omestic banks?	Yes Yes
Sec 19 a1b D pi	ervices to domestic banks? Does the Entity allow domestic bank clients to rovide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with omestic banks? Does the Entity offer Correspondent Banking ervices to foreign banks?	No Yes
Sec 19 a1b D pi 19 a1c D in do	ervices to domestic banks? Does the Entity allow domestic bank clients to rovide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with omestic banks? Does the Entity offer Correspondent Banking ervices to foreign banks? Does the Entity allow downstream relationships with foreign banks?	Yes Yes
19 a1b D pi 19 a1c D in do 19 a1d D see 19 a1e D w 19 a1f D D	ervices to domestic banks? Does the Entity allow domestic bank clients to rovide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with omestic banks? Does the Entity offer Correspondent Banking ervices to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks?	Yes Yes No
19 a1b D pi 19 a1c D in do 19 a1d D se 19 a1d D se 19 a1e D w 19 a1f D in	ervices to domestic banks? Does the Entity allow domestic bank clients to rovide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with omestic banks? Does the Entity offer Correspondent Banking ervices to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks?	Yes Yes
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19 c Cross-Border Remitances Yes 19 d Dorses Bulk Cash Delary No. 19 d Dorses Bulk Cash Delary No. 19 e Hold Mall No. 19 f Heradonal Cash Letter No. 19 f Personal Cash Letter No. 19 h Pays The Transport Cash Letter No. 19 h Pays The Transport Cash Letter No. 19 h Pays The Transport Cash Letter No. 19 l Pays The Secretion St. 19 l Pays The Secretion St.	19 a1i	in place to identify downstream relationships with	Yes	•
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19 g Very time Securities No 19 g Very time Securities No 19 h Payabile Through Accounts No 19 h Toda Finance Ves 19 h Payabile Through Accounts No 19 p Payabile Through Acco	0.0.00			
19 g Low Price Securities No 19 h Paybe Through Accounts No 19 p Paybe				_
Payable Through Accounts No				
Payment services to non-bank entities who may then offer left plarty payment services to their customers? 19 II If Y, please select all that apoly below? 19 II Third Party Payment Services Providers 19 II Payment Service Providers 19 II Payment Service Providers 19 II Commerce Platforms No. Other - Pleaste explain Private Banking 19 Private Banking 19 Private Banking 19 Remois Deposit Capture (RDC) No. 19 II Private Banking 19 Remois Deposit Capture (RDC) No. 19 II Private Banking 19 No. Slored Value Instruments No. Virtual Assets 19 O Virtual Assets 19 Private Banking IV Virtual Assets 19 Private Banking Service 19 Private Banking 19	_			
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19 12 Third Party Payment Service Providers 19 13 Virtual Asset Service Providers (VASPs) 19 14 c Commerce Pietforms Other - Please explain 19 15 Other - Please explain 19 16 Sponzoring Private ATMs 19 17 Sponzoring Private ATMs 19 18 Trade Finance 19 19 Virtual Asset Service ATMs 19 10 Virtual Asset Service ATMs 19 10 Trade Finance 19 10 Virtual Assets 10 Virtual As	10:1	If V please select all that apply helow?		
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19 k Remote Deposit Capture (RDC) 19 l Sponsoring Private ATMs No 19 m Stored Value Instruments No 19 n Trade Finance 19 o Virtual Assets 19 p For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence: 19 p1 Check cashing service 19 p1 Check cashing service 19 p2 Wire transfers No 19 p2 If yes, state the applicable level of due diligence 19 p2 If yes, state the applicable level of due diligence 19 p3 Foreign currency conversion 19 p3 Foreign currency conversion 19 p3 Foreign currency conversion 19 p4 Size of Monetary Instruments No 19 p4 Size of Monetary Instruments No 19 p5 If yes, state the applicable level of due diligence 19 p6 If yes, state the applicable level of due diligence 19 p6 If yes, state the applicable level of due diligence 19 p7 Foreign currency conversion No 19 p8 If yes, state the applicable level of due diligence 19 p6 If yes, state the applicable level of due diligence No 19 p7 Foreign currency experiones to walk-in customers please provide more detail here, including describing the level of due diligence. No 19 p6 If yes, state the applicable level of due diligence No	19 i5	Other - Please explain		
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19 m Stored Value Instruments No Yes				
19 n Trade Finance 19 o Virtual Assets 19 o Virtual Assets 19 p For each of the following please state whether you offer the service to walk-in-customers and if so, the applicable level of due diligence. 19 p1 Check cashing service 19 p2 If yes, state the applicable level of due diligence. 19 p2 Wire transfers 19 p3 Foreign currency conversion 19 p3 Foreign currency conversion 19 p3 Foreign currency conversion 19 p4 If yes, state the applicable level of due diligence. 19 p4 Sale of Monetary Instruments 19 p4 If yes, state the applicable level of due diligence. 19 p5 If yes, state the applicable level of due diligence. 19 p6 Sale of Monetary Instruments 19 p7 If yes, state the applicable level of due diligence. 19 p7 If yes, state the applicable level of due diligence. 19 p6 If yes, state the applicable level of due diligence. 19 p7 If yes, state the applicable level of due diligence. 19 p7 If yes, state the applicable level of due diligence. 19 p8 If yes, state the applicable level of due diligence. 19 p8 If yes, state the applicable level of due diligence. 19 p8 If yes, state the applicable level of due diligence. 19 p8 If yes, state the applicable level of due diligence. 19 p8 If yes, state the applicable level of due diligence. 19 p8 If yes, state the applicable level of due diligence. 19 p8 If yes, state the applicable level of due diligence. 19 yes even yes select 19 p8 If yes, state the applicable level of due diligence. 19 yes Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/se that this applies to. 21 If appropriate, provide any additional information/context to the answers in this section. 22 a Appointed Officer with sufficient Yes 22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes 22 c Beneficial Ownership Yes 22 d Cash Reporting 24 c Sea Reporting 25 per Screening 26 yes 27 per Screening 27 per Screening 28 yes 29 policies and Procedures 29 yes				F
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19 pt If yes, state the applicable level of due diligence Please select 19 p2	19 p	offer the service to walk-in customers and if so, the		
19 pf Please select Please	19 n1	Check cashing service	No	
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22 j PEP Screening Yes 22 k Risk Assessment Yes	22 i	Policies and Procedures	Yes	
22 k Risk Assessment Yes	22 i	PEP Screening	Yes	
				-
221 Sanctions Yes				_
		L DAUGIOUS	1162	

22 m	Suspicious Activity Reporting	Yes	
22 n	Training and Education	Yes	
22 o	Transaction Monitoring	Yes	200
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	Yes	•
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.		
4. ANTI	BRIBERY & CORRUPTION		
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:	Both joint ventures and third parties acting on behalf of the Entity	
35	Does the Entity have a global ABC policy that:	Both pilit ventures and third parties acting on contain of the Entity	
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 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 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.		
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	~
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes	-

40.1	1 A		_
40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes	*
40 c	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 42 d	2nd Line of Defence	Yes	
42 d 42 e	3rd Line of Defence Third parties to which specific compliance activities	Yes	=
	subject to ABC risk have been outsourced	No	•
42 f	Non-employed workers as appropriate (contractors/consultants)	Yes	•
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes	•
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	~
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A	
45	If appropriate, provide any additional information/context to the answers in this section.		
5. AML. C	TF & SANCTIONS POLICIES & PROCEDURES		100
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:		
46 a	Money laundering	Yes	
46 b	Terrorist financing	Yes	
46 c	Sanctions violations	Yes	
47	Are the Entity's policies and procedures updated at least annually?	Yes	~
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 49 a	Prohibit the opening and keeping of anonymous	Yes	Ţ
49 b	and fictitious named accounts Prohibit the opening and keeping of accounts for	Yes	V
49 c	unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide	Yes	T
49 d	banking services to unlicensed banks 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	•
	• NAT - NAT	·	

54 d Geography Yes Destrict EWRA COVER the controls effectiveness components detailed below: 55 a Transaction Monitoring Yes Destrict Wes Destrict				
terminating existing customer relationships due to financial crime risk. Define the process for exiting clients for financial crime risks. Define the process for exiting clients for financial crime risks. B	49 i	issues/potentially suspicious activity identified by	Yes	-
crime reasons that applies across the entity, including foreign transfores and defiliates 481 Define the process and controls to identify and handle customers that were previously wided for financial crime reasons if they seek to re-establish a relationship 49 m Custine the processes regarding acreeming for an analysis of financial crime reasons if they seek to re-establish a relationship of the processes regarding acreeming for sundown processes regarding acreeming for sundown processes for the maintenance of intenal violatilists 50 These the Entity defined a risk bilanance statement or intenal violatilists 51 Does the Entity have record retention procedures that comply with applicable leave? 52 Confirm that all responses provided in the above Section are representative and and the branches of the processes of the maintenance of intenal procedures that comply with applicable leave? 52 Confirm that all responses provided in the above Section are representative and intended to and the branches of all the LES branches 52 If N, clarify which questions the difference retails to and the branches that this applies to, and the branches that this applies to the answers in this section. 53 If appropriate, provide any additional information to the answers in this section. 54 Client	49 j	terminating existing customer relationships due to	Yes	•
handle customers that were prevously exited for financial crime reasons if they seek to restablish a relationship of sanctions, PEPs and Adverse Media/Negative News Yes 49 n Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News Yes 50 Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business? 51 Does the Entity have record retention procedures that comply with applicable laws? 52 Confirm that all responses provided in the above Section are representative of all the LE's branches 53 Confirm that all responses provided in the above Section are representative of all the LE's branches 54 Confirm that all responses provided in the above Section are representative of all the LE's branches 55 If appropriate, provide any additional information/context to the answers in this section. 6. AML, CTF & SANCTIONS RISK ASSESSMENT 54 Congraby 55 Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: 55 Congraby 56 Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: 56 Product 57 Congraby AML & CTF EWRA cover the controls of the Entity AML & CTF EWRA cover the control of the Entity AML & CTF EWRA cover the control of the Entity AML & CTF EWRA cover the control of the Entity AML & CTF EWRA cover the control of the Entity AML & CTF EWRA cover the control of the Entity AML & CTF EWRA cover the control of the Entity AML & CTF EWRA cover the control of the control of the Entity AML & CTF EWRA cover the control of the Entity AML & CTF EWRA cover the control of the Entity AML & CTF EWRA cover the control of the CTF EWRA cover	49 k	crime reasons that applies across the entity,	Yes	•
sanctions, PEPs and Ariverse MedianNegative Neve Yes	49 I	handle customers that were previously exited for financial crime reasons if they seek to re-establish a	Yes	•
internal Vasibilities* National Properties National Properties	49 m		Yes	•
similar document which defines a risk boundary around their business? 51 Does the Entity have record retention procedures that comply with applicable lawa? 51 If Y, what is the retention period? 52 Confirm that all responses provided in the above Section are representative of all the LE's branches 52 If N, clarify which questions the difference's relate to and the branch'ses that this applies to. 53 If appropriate, provide any additional information-foothers to the answers in this section. 6. AML, CTF & SANCTIONS RISK ASSESSMENT 54 Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: 54 Client 55 Customer Due Dilegnece 56 Customer Due Dilegnece 76 Ves 57 Name Screening against Adverse Media/Negative News 58 Name Screening against Adverse Media/Negative News 59 Does the Entity's SANL & CTF EWRA been completed in the last 12 months? 56 I Transaction Monitoring 76 Name Screening against Adverse Media/Negative News 57 Does the Entity's SANL & CTF EWRA been completed in the last 12 months? 58 I Transaction Screening 59 Name Screening against Adverse Media/Negative News 50 Use the Entity's SANL & CTF EWRA been completed in the last 12 months? 58 I Transaction Screening 59 Ose the Entity's Sanctions EWRA cover the inherent risk components detailed below: 59 Ose the Entity's Sanctions EWRA cover the inherent risk components detailed below: 57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 57 Client 79 Product 79 Pro	49 n		Yes	-
comply with applicable laws? If Y, what is the retention period? If Y, what is the retention period? Section are representative of all the LE's branches Section are representative of all the LE's branches 1 If N, danfy which questions the difference/s relate to and the branches that this applies to. If Appropriate, provide any additional information/context to the answers in this section. SAML, CTF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Yes Candidate of the Co	50	similar document which defines a risk boundary	Yes	•
Syears or more Syears or more Syes 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 and the branch'es that the answers in this section. SAMIL, CTF & SANCTIONS RISK ASSESSMENT 54. Does the Entity's AMIL & CTF EWRA cover the inherent onto seffectiveness components detailed below: 55. Does the Entity's AMIL & CTF EWRA cover the controls effectiveness components detailed below: 55. Does the Entity's AMIL & CTF EWRA cover the detailed below: 55. Transaction Screening Yes S5. Transaction Screening Yes S5. Transaction Screening Yes S5. Transaction Screening Yes S6. Transaction Screening Yes S7. Transaction Screening Yes S6. Transaction Screening Yes S7. Does the Entity's SANL & CTF EWRA been completed in the last 12 months? The last 1	51		Yes	•
Section are representative of all the LEs 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. 6. AML, CTF & SANCTIONS RISK ASSESSMENT 54 Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: 54 a Client Yes Channel Yes Casteman Stateman Stateman Control of Receiver and Stateman Sta	51 a	If Y, what is the retention period?	5 years or more	*
If N, clarify which questions the difference/s relate to and the branchies that this applies to. N/A	52		Yes	~
information/context to the answers in this section. 8. AML_CTF & SANCTIONS RISK ASSESSMENT 54	52 a	If N, clarify which questions the difference/s relate to	N/A	
Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: State	53			
Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: State	A ANII AT	TO CAMETICAL PICK ASSESSMENT		7 37
Section		Does the Entity's AML & CTF EWRA cover the		
Second S	54 a	Client	Yes	
See	54 b	Product	Yes	_
Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Yes Customer Due Diligence Yes FF Gustomer Due Diligence Yes Transaction Screening Yes Transaction Screening Yes Transaction Screening Yes Name Screening against Adverse Media/Negative News Yes Training and Education Yes Training and Education Yes Governance Yes Training and Education Yes The Europhy's Annual Script Wes The Europhy Yes The Euro		Channel	Yes	V
controls effectiveness components detailed below: 55 a Transaction Monitoring Yes Customer Due Diligence Yes 55 c PEP Identification Yes 55 d Transaction Screening Yes 55 d Transaction Screening Yes 55 e Name Screening against Adverse Media/Negative News Yes 55 f Training and Education Yes 55 g Governance Yes 55 h Management Information Yes 56 Has the Entity's AML & CTF EWRA been completed in the last 12 months? 76 poes the Entity's Sanctions EWRA cover the inherent risk components detailed below: 57 c Channel Yes 58 a Customer Due Diligence Yes 58 b Governance Yes Customer Due Diligence Yes Customer Due Diligence Yes Customer Due Diligence Yes Customer Due Customer Due Customer Amagement Yes Customer Due Diligence Yes Customer Due Diligence Yes Customer Due Diligence Yes Customer Due Diligence Yes Customer Due Customer Due Customer Amagement Yes Customer Due Diligence Yes Customer Due Customer Due Customer Amagement Yes Customer Due Customer Custo			Yes	
Second Politication Yes	55	controls effectiveness components detailed below:		
SEC PEP Identification Yes SEC Transaction Screening Yes SEC Transaction Screening against Adverse Media/Negative News Yes SEC Name Screening against Adverse Media/Negative News Yes SEC Name Screening against Adverse Media/Negative News Yes SEC News SEC				
Transaction Screening Yes Name Screening against Adverse Media/Negative News Styles Training and Education Yes Governance Yes Taining and Education Yes Styles Governance Yes Taining and Education Yes Training and Education Training and Educatio			MODEL .	
Name Screening against Adverse Media/Negative News Streening against Adver	808 30			Y
Second Process Seco		Name Screening against Adverse Media/Negative		-
State		A STATE OF THE STA		
Management Information Yes Second Processing Proc	Proceedity.		100000	
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: To a Client Yes Every Channel Ever				
EWRA was completed. 57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 57 Client 57 C Channel 57 C Channel 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 C Customer Due Diligence 58 C Customance 79 Yes 58 C List Management 79 Yes 59 C List Management		Has the Entity's AML & CTF EWRA been completed		-
risk components detailed below: 57 a Client Yes 57 b Product Yes 57 c Channel Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	56 a		N/A	
57 b Product Yes 57 c Channel Yes 57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	57			
57 c Channel Yes 57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes				
57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes		Client		
Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	57 b	Client Product	Yes	
effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	57 b 57 c	Client Product Channel	Yes Yes	
58 b Governance Yes 58 c List Management Yes 58 c 58 c </td <td>57 b 57 c 57 d</td> <td>Client Product Channel Geography</td> <td>Yes Yes</td> <td></td>	57 b 57 c 57 d	Client Product Channel Geography	Yes Yes	
58 c List Management Yes E	57 b 57 c 57 d 58	Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes Yes	
	57 b 57 c 57 d 58	Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes Yes Yes Yes	
58 d Management Information Yes	57 b 57 c 57 d 58 58 a 58 b	Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes Yes Yes Yes Yes Yes	

58 e	Name Screening	Yes	
58 f	Transaction Screening	Yes	
58 g	Training and Education	Yes	
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes	•
59 а	If N, provide the date when the last Sanctions EWRA was completed.		
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	•
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	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?	Yes	
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes	-
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:		
64 a	Customer identification	Yes	
64 b	Expected activity	Yes	
64 c	Nature of business/employment	Yes	V
64 d	Ownership structure	Yes	V
64 e	Product usage	Yes	
64 f	Purpose and nature of relationship	Yes	_
64 g	Source of funds Source of wealth	Yes	
64 h	Are each of the following identified:	Yes	
65 a	Ultimate beneficial ownership	Yes	$\overline{}$
65 a1	Are ultimate beneficial owners verified?	Yes	T
65 b	Authorised signatories (where applicable)	Yes	V
65 c	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	분
67 a5 67 a6	Adverse Information Other (specify)	Yes	_
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	V
68 a2	KYC renewal	Yes	
68 a3	Trigger event	Yes	묻
68 a4 68 a4a	Other If yes, please specify "Other"	Yes We have a limited number of High Risk Corporate (Banks) that we have been in a relationship for several years. We periodically visit these banks as part of our KYC Renewal process.	with
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes	•
69 a	If Y, is this at:		_
69 a1	Onboarding	Yes	-
69 a2	KYC renewal	Yes	-

69 a3	Trigger event	Yes	Y
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?		-
71 a	If Y, is this at:		May.
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	V
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether	Yes	-
74	they are PEPs, or controlled by PEPs? Is KYC renewed at defined frequencies based on risk	Yes	
74 a	rating (Periodic Reviews)? If yes, select all that apply:	165	
74 a1	Less than one year	No	
74 a2	1 – 2 years	Yes	
74 a3	3 – 4 years	Yes	V
74 a4	5 years or more	No	
74 a5	Trigger-based or perpetual monitoring reviews	Yes	Y
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	V
76 b	Respondent Banks	EDD on risk-based approach	Y
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	Prohibited	V
76 e	Gambling customers	Prohibited	V
76 f	General Trading Companies	Prohibited	T
200	Marijuana-related Entities	Prohibited	V
76 g			-
76 h	MSB/MVTS customers	Prohibited	
76 i	Non-account customers	Prohibited	
76 j	Non-Government Organisations	Do not have this category of customer or industry	V
76 k	Non-resident customers	Prohibited	Y
761	Nuclear power	Prohibited	
76 m	Payment Service Providers	Do not have this category of customer or industry	V
76 n	PEPs	EDD on risk-based approach	
76 o	PEP Close Associates	EDD on risk-based approach	V
76 p	PEP Related	EDD on risk-based approach	Y
76 q	Precious metals and stones	Prohibited	~
76 r	Red light businesses/Adult entertainment	Prohibited	V
		EDD on risk-based approach	V
76 s	Regulated charities Shell banks	Prohibited	V
76 u	Travel and Tour Companies	Prohibited	V
76 v	Unregulated charities	Prohibited	V
76 w	Used Car Dealers	Prohibited	~
76 x	Virtual Asset Service Providers	Prohibited	7
76 y	Other (specify)		
77	If restricted, provide details of the restriction		
78	Does EDD require senior business management and/ or compliance approval?	Yes	*

78 a	If Y indicate who provides the approval:	Both
79	Does the Entity have specific procedures for	
	onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	No ·
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	N/A
82	If appropriate, provide any additional information/context to the answers in this section.	
8. MONITO	RING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	These are SWIFT, Cash and Trade Finance. Relationship managers receive daily transactional automated transaction monitoring reports on all amounts exceeding threshold limits within our core banking system for investigation. These breaches are checked against individual client account activity. Unexpected or unapproved
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Both
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	GBP Compliance Acuant
84 b2	When was the tool last updated?	<1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	N/A
	If appropriate, provide any additional information/context to the answers in this section.	
9. PAYMEN	T TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group	Yes
ì	Payment Transparency Standards?	103

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	POCA, Criminial Finances Act, Sanctions and AML Act, EU5MLD
93 c	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	Yes
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?	Both Automated and Manual
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Both
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Refinitiv World Check
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?	Combination of automated and manual

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 sanctions screening processes:		
106 a	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 Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data	~
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data	~
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data	
106 e 106 f	Lists maintained by other G7 member countries Other (specify)	Used for screening customers and beneficial owners and for filtering transactional data	
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:		
107 a	Customer Data	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.		
11. TRAINI	ING & EDUCATION		
111	Does the Entity provide mandatory training, which includes:		
111 a	Identification and reporting of transactions to government authorities	Yes	*
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes	•
111 с	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 112 b	Board and Senior Committee Management 1st Line of Defence	Yes	
	I TELLING OF LIGHTON	Yes	
		l Vos	
112 c	2nd Line of Defence	Yes	▼.
		Yes Yes Not Applicable	-
112 c 112 d 112 e	2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have	Yes	•
112 c 112 d	2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced	Yes Not Applicable Yes	▼ ▼
112 c 112 d 112 e	2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and	Yes Not Applicable Yes	▼ ▼
112 c 112 d 112 e 112 f 113	2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities? Does the Entity provide customised training for AML,	Yes Not Applicable Yes 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.	
12 OHALIT	Y ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based	
	Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
120	If appropriate, provide any additional information/context to the answers in this section.	
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, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Yearly
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes 🔻
123 b	Enterprise Wide Risk Assessment	Yes
123 c 123 d	Governance	Yes Yes
123 d	KYC/CDD/EDD and underlying methodologies Name Screening & List Management	Yes Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes Yes 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)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
126	If appropriate, provide any additional information/context to the answers in this section.	
14. FRAU		
127	Does the Entity have policies in place addressing fraud risk?	Yes
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
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.	
Wolfsberg		BDDQ V1.4) king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of
		Crimes Compliance OR aguirdant
	y Laundering, Chief Compliance Officer, Global Head of Financial	Crimes Compliance OR equivalent)
Anti- Mone	ernational Bank Plc (Financial Institut	Crimes Compliance OR equivalent) ion 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.
Anti- Mone Jordan Int every effor	ernational Bank Plc (Financial Institut tt to remain in full compliance with all applicable financial crime laws	ion name) is fully committed to the fight against financial crime and makes
Jordan Interest of the Finance Interest of the Interes	ernational Bank Plc (Financial Institut It to remain in full compliance with all applicable financial crime laws cial Institution understands the critical importance of having effective gulatory obligations. cial Institution recognises the importance of transparency regardin	ion 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.
Anti- Mone Jordan Intervery effor The Finance legal and restandards The Finance standards	ernational Bank Pic (Financial Institut t to remain in full compliance with all applicable financial crime law: cial Institution understands the critical importance of having effecti egulatory obligations. cial Institution recognises the importance of transparency regardin	ion 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. we and sustainable controls to combat financial crime in order to protect its reputation and to meet its ag parties to transactions in international payments and has adopted/is committed to adopting these by with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles
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Anti- Mone Jordan Int every effor The Finan- legal and r The Finan- standards The Finan- The inform The Finan-	ernational Bank Pic (Financial Institut to remain in full compliance with all applicable financial crime law: cial Institution understands the critical importance of having effective egulatory obligations. cial Institution recognises the importance of transparency regardin cial Institution further certifies it complies with / is working to compl ation provided in this Wolfsberg CBDDQ will be kept current and v cial Institution commits to file accurate supplemental information or Goldberg (Global Head of	ion 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. We and sustainable controls to combat financial crime in order to protect its reputation and to meet its against transactions in international payments and has adopted/is committed to adopting these by with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles will be updated no less frequently than every eighteen months.
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Anti- Mone Jordan Inti every effo The Finan- legal and r The Finan- standards The Finan- The Finan- The Finan- I. Justine the answe Institution. I. Kevin.	emational Bank Pic (Financial Institut to remain in full compliance with all applicable financial crime laws cial Institution understands the critical importance of having effective egulatory obligations. cial Institution recognises the importance of transparency regardin cial Institution further certifies it complies with / is working to complation provided in this Wolfsberg CBDDQ will be kept current and vector institution commits to file accurate supplemental information or Goldberg (Global Head of the provided in this Wolfsberg CBDDQ are complete and correct to	ion 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. We and sustainable controls to combat financial crime in order to protect its reputation and to meet its against transactions in international payments and has adopted/is committed to adopting these by with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles will be updated no less frequently than every eighteen months. In a timely basis. Of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that my honest belief, and that I am authorised to execute this declaration on behalf of the Financial divalent), certify that I have read and understood this declaration on behalf of the Financial institution.