the Wolfsberg Group

Financial Institution Name: Location (Country) : Bank of China US Branches U.S.

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10 Provide Legal Entity Identifier (LEI) if available 54930053HGCFWVHYZX42 2. AML, CTF & SANCTIONS PROGRAMME 54930053HGCFWVHYZX42 11 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 1 11 a Appointed Officer with sufficient experience/expertise Yes 11 b Adverse Information Screening Yes 11 c Beneficial Ownership Yes 11 d Cash Reporting Yes 11 e CDD Yes 11 f EDD Yes	9		No	
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11 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 11 a Appointed Officer with sufficient experience/expertise 11 b Adverse Information Screening Yes 11 c Beneficial Ownership Yes 11 d Cash Reporting Yes 11 e CDD Yes 11 g Independent Testing Yes			54930053HGCFWVHYZX42	
11 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 11 a Appointed Officer with sufficient experience/expertise 11 b Adverse Information Screening Yes 11 c Beneficial Ownership Yes 11 d Cash Reporting Yes 11 e CDD Yes 11 g Independent Testing Yes				
11 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 11 a Appointed Officer with sufficient experience/expertise 11 b Adverse Information Screening Yes 11 c Beneficial Ownership Yes 11 d Cash Reporting Yes 11 e CDD Yes 11 g Independent Testing Yes	2. AML. C	2 AMI CTE & SANCTIONS PROGRAMME		
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11 b Adverse Information Screening Yes 11 c Beneficial Ownership Yes 11 d Cash Reporting Yes 11 e CDD Yes 11 f EDD Yes 11 g Independent Testing Yes			Yes	
11 c Beneficial Ownership Yes 11 d Cash Reporting Yes 11 e CDD Yes 11 f EDD Yes 11 g Independent Testing Yes	44 6		Vee	
11 d Cash Reporting Yes 11 e CDD Yes 11 f EDD Yes 11 g Independent Testing Yes				
11 e CDD Yes 11 f EDD Yes 11 g Independent Testing Yes				
11 f EDD Yes 11 g Independent Testing Yes	-			
11 h Periodic Review Yes	11 g		Yes	
	11 h	Periodic Review	Yes	

<u>11 i</u>	Policies and Procedures	Yes
<u>11 j</u>	PEP Screening	Yes
<u>11 k</u> 11 l	Risk Assessment Sanctions	Yes Yes
		Yes
<u>11 m</u> 11 n	Suspicious Activity Reporting Training and Education	Yes
11 n 11 o	Transaction Monitoring	Yes
12	Is the Entity's AML, CTF & Sanctions policy	les
12	approved at least annually by the Board or	Yes
	equivalent Senior Management Committee?	
13	Does the Entity use third parties to carry out any	
	components of its AML, CTF & Sanctions	No
	programme?	110
13 a	If Y, provide further details	
		Not Applicable
14	Does the entity have a whistleblower policy?	Yes
3. ANTI	BRIBERY & CORRUPTION	
15	Has the Entity documented policies and	
	procedures consistent with applicable ABC	
	regulations and requirements to reasonably	Yes
	prevent, detect and report bribery and corruption?	
16		
	Does the Entity's internal audit function or other	Vez
	independent third party cover ABC Policies and	Yes
	Procedures?	
17	Does the Entity provide mandatory ABC training	
	to:	
17 a	Board and Senior Committee Management	Yes
17 b	1st Line of Defence	Yes
17 c	2nd Line of Defence	Yes
17 d	3rd Line of Defence	Yes
17 e	Third parties to which specific compliance	
	activities subject to ABC risk have been	Not Applicable
	outsourced	Not Applicable
17 f		
17.1	Non-employed workers as appropriate	Yes
	(contractors/consultants)	
	(contractors/consultants) CTF & SANCTIONS POLICIES & PROCEDU	RES
4. AML, 18		RES
	CTF & SANCTIONS POLICIES & PROCEDU	RES
	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and	RES
	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF	RES
18	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	RES Yes
18 18 a	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering	
18 18 a 18 b	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing	Yes
18 18 a	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations	Yes Yes
18 18 a 18 b 18 c	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures	Yes Yes
18 a 18 b 18 c 19	Money laundering Terrorist financing Sanctions violations	Yes Yes
18 18 a 18 b 18 c	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of	Yes Yes
18 a 18 b 18 c 19 19 a	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes Yes Yes
18 a 18 b 18 c 19	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts	Yes Yes
18 a 18 b 18 c 19 19 a	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes Yes Yes Yes
18 a 18 a 18 b 18 c 19 c 19 a 19 b	Money laundering Sanctions volutions Does the Entity have policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes Yes Yes
18 a 18 a 18 b 18 c 19 c 19 a 19 b	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes Yes Yes Yes Yes
18 18 a 18 b 18 c 19 c 19 c 19 d	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks	Yes Yes Yes Yes Yes
18 a 18 a 18 b 18 c 19 a 19 a 19 b 19 c	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another Entity that	Yes Yes Yes Yes Yes
18 a 18 b 18 c 19 a 19 a 19 a 19 b 19 c 19 d 19 e	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another Entity that provides services to shell banks	Yes Yes Yes Yes Yes Yes
18 18 a 18 b 18 c 19 c 19 c 19 d	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another Entity that provides services to shell banks Prohibit dealing with another Entity that provides services to shell banks	Yes Yes Yes Yes Yes Yes
18 18 a 18 b 18 c 19 c 19 c 19 d 19 c 19 d 19 c 19 d 19 f	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another Entity that provides services to shell banks Prohibit dealing with another Entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities	Yes Yes Yes Yes Yes Yes Yes
18 a 18 b 18 c 19 a 19 a 19 a 19 b 19 c 19 d 19 e	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another Entity that provides services to shell banks Prohibit dopening and keeping of accounts for Section 311 designated entities	Yes Yes Yes Yes Yes Yes Yes
18 18 a 18 b 18 c 19 c 19 c 19 d 19 c 19 d 19 c 19 d 19 f	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another Entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance	Yes Yes Yes Yes Yes Yes Yes Yes Yes
18 18 a 18 b 18 c 19 c 19 c 19 d 19 c 19 d 19 c 19 d 19 f	CFF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another Entity that prohibit dealing with another Entity that prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio,	Yes Yes Yes Yes Yes Yes Yes
18 18 a 18 b 18 c 19 c 19 c 19 d 19 c 19 d 19 c 19 d 19 f	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another Entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance	Yes Yes Yes Yes Yes Yes Yes Yes Yes
18 18 a 18 b 18 c 19 c 19 c 19 d 19 c 19 d 19 c 19 d 19 f	CFF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another Entity that prohibit dealing with another Entity that prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio,	Yes Yes Yes Yes Yes Yes Yes Yes Yes
18 18 a 18 b 18 c 19 19 a 19 b 19 c 19 d 19 e 19 f 19 g	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts for unicensed banks and/or NBFIs Prohibit the opening and keeping of accounts for unicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another Entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes Yes Yes Yes Yes Yes Yes Yes Yes
18 18 a 18 b 18 c 19 19 a 19 b 19 c 19 d 19 e 19 f 19 g	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts for unlicensed banks and/or NBFIs Prohibit the oping and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another Entity that provides services to shell banks Prohibit dealing with another Entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes Yes Yes Yes Yes Yes Yes Yes Yes
18 18 a 18 b 18 c 19 19 a 19 b 19 c 19 d 19 e 19 f 19 g 19 h	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another Entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes Yes Yes Yes Yes Yes Yes Yes Yes
18 18 a 18 b 18 c 19 19 a 19 b 19 c 19 d 19 e 19 f 19 g	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another Entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates Define the process for escalating financial	Yes Yes Yes Yes Yes Yes Yes Yes Yes
18 18 a 18 b 18 c 19 19 a 19 b 19 c 19 d 19 e 19 f 19 g 19 h	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another Entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates Define the process for escalating financial crime risk issues/potentially suspicious activity	Yes Yes Yes Yes Yes Yes Yes Yes Yes
18 18 a 18 b 18 c 19 19 a 19 b 19 c 19 d 19 e 19 f 19 g 19 h 19 i	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another Entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes Yes Yes Yes Yes Yes Yes Yes Yes
18 18 a 18 b 18 c 19 19 a 19 b 19 c 19 d 19 e 19 f 19 g 19 h	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts for unlicensed banks and/or NBFIs Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another Entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees Outline the processes regarding screening for	Yes
18 18 a 18 b 18 c 19 19 a 19 b 19 c 19 d 19 e 19 f 19 g 19 h 19 i	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another Entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes Yes Yes Yes Yes Yes Yes Yes Yes
18 18 a 18 b 18 c 19 19 a 19 b 19 c 19 d 19 e 19 f 19 g 19 h 19 i	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts for unlicensed banks and/or NBFIs Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another Entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees Outline the processes regarding screening for	Yes
18 18 a 18 b 18 c 19 19 a 19 b 19 c 19 d 19 e 19 f 19 g 19 h 19 i	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts for unlicensed banks and/or NBFIs Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another Entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
18 18 a 18 b 18 c 19 19 a 19 p 19 d 19 c 19 d 19 c 19 d 19 e 19 f 19 g 19 h 19 j	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts for unlicensed banks and/or NBFIs Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another Entity that provides services to shell banks Prohibit dealing with another Entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates Define the processe for escalating financial crime risk issues/potentially suspicious activity identified by employees Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
18 a 18 a 18 b 18 c 19 a 19 a 19 a 19 c 19 a 19 c 19 a 19 c 19 a 19 c 19 c	CTF & SANCTIONS POLICIES & PROCEDU Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts for unlicensed banks and/or NBFIs Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another Entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes

21	Does the Entity have record retention procedures	Yes
21 a	that comply with applicable laws? If Y, what is the retention period?	
21 a	ii 1, what is the retention period?	5 years or more
5. KYC,	CDD and EDD	
22	Does the Entity verify the identity of the customer?	Yes
23	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
24	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
24 a	Customer identification	Yes
24 b	Expected activity	Yes
24 c	Nature of business/employment	Yes
24 d	Ownership structure	Yes
24 e	Product usage	Yes
24 f	Purpose and nature of relationship	Yes
24 g 24 h	Source of funds Source of wealth	Yes Yes
25	Are each of the following identified:	
25 a	Ultimate beneficial ownership	Yes
25 a1	Are ultimate beneficial owners verified?	Yes
25 b	Authorised signatories (where applicable)	Yes
25 с	Key controllers	Yes
25 d	Other relevant parties	Yes
26	Does the due diligence process result in customers receiving a risk classification?	Yes
27	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
28	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
29	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
29 a	If yes, select all that apply:	
29 a1	Less than one year	No
29 a2 29 a3	1 – 2 years 3 – 4 years	Yes Yes
29 a3 29 a4	5 years or more	No
29 a5	Trigger-based or perpetual monitoring reviews	Yes
29 a6	Other (please specify)	
30	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?	
30 a	Arms, Defence, Military	EDD on a risk based approach
30 b	Correspondent Banks	EDD on a risk based approach
30 b1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
30 c	Embassies/Consulates	EDD on a risk based approach
30 d	Extractive industries	EDD on a risk based approach
30 e	Gambling customers	EDD on a risk based approach
30 f	General Trading Companies	EDD on a risk based approach
30 g		Prohibited
	Marijuana-related Entities	
30 h	MSB/MVTS customers	EDD on a risk based approach
30 i	Non-account customers	EDD on a risk based approach
30 j	Non-Government Organisations	EDD on a risk based approach
30 k	Non-resident customers	EDD on a risk based approach
30 I	Nuclear power	Do not have this category of customer or industry
	Payment Service Provider	EDD on a risk based approach

Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2)

30 n	PEPs	EDD on a risk based approach
30 0	PEP Close Associates	EDD on a risk based approach
30 p	PEP Related	EDD on a risk based approach
30 q	Precious metals and stones	EDD on a risk based approach
30 r	Red light businesses/Adult entertainment	EDD on a risk based approach
30 s	Regulated charities	EDD on a risk based approach
30 t	Shell banks	Prohibited
30 u		
30 v	Travel and Tour Companies	EDD on a risk based approach
30 v 30 w	Unregulated charities Used Car Dealers	Do not have this category of customer or industry
30 w 30 x		Do not have this category of customer or industry
30 x 30 y	Virtual Asset Service Providers Other (specify)	Prohibited
30 y		For customers or industries not listed above, on a case-by-case basis, Bank of China, US Branches may take EDD or EDD & Restricted approach or Prohibited to mitigate BSA/AML/sanctions risks.
31	If restricted, provide details of the restriction	Restrictive measures include limiting the size, type of transactions, type of customers, jurisdiction locations, licensing status, high level of management review and approval, EDD or SDD.
6. MON	ITORING & REPORTING	
32	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
33	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
33 a	If manual or combination selected, specify what type of transactions are monitored manually	Automated monitoring is primary, supplemented by manual monitoring
34	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
34 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes
35	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
7. PAYN	IENT TRANSPARENCY	
36	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
37	Does the Entity have policies, procedures and processes to reasonably comply with and have controls in place to ensure compliance with:	
37 a	FATF Recommendation 16	Yes
37 b	Local Regulations	Yes
37 b1	If Y, Specify the regulation	BOC US Branches comply with regulatory requirements set by the US.
37 c	If N, explain	Not Applicable

~~	CTIONS	
38	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	Yes
	through accounts held at foreign financial	
	institutions?	
39		
55	Does the Entity have policies, procedures or other	
	controls reasonably designed to prohibit and/or	
	detect actions taken to evade applicable	Yes
	sanctions prohibitions, such as stripping, or the	
	resubmission and/or masking, of sanctions	
	relevant information in cross border transactions?	
40	Does the Entity screen its customers, including	
	beneficial ownership information collected by the	
	Entity, during onboarding and regularly thereafter	Yes
	against Sanctions Lists?	
	-	
41	Select the Sanctions Lists used by the Entity in its	
	sanctions screening processes:	
41 a	Consolidated United Nations Security Council	Used for screening customers and beneficial owners and for filtering
	Sanctions List (UN)	transactional data
41 b	United States Department of the Treasury's	Used for screening customers and beneficial owners and for filtering
	Office of Foreign Assets Control (OFAC)	transactional data
41 c	Office of Financial Sanctions Implementation	
	HMT (OFSI)	Not used
41 d		Used for screening customers and beneficial owners and for filtering
410	European Union Consolidated List (EU)	transactional data
41 e	Lists maintained by other G7 member	Ni-4
	countries	Not used
41 f	Other (specify)	
		List of the Ministry of Public Security of China applies to all the payment
		messages.
		incodeco.
	Describe Fortheless a shortheless are a	
42	Does the Entity have a physical presence, e.g.	
	branches, subsidiaries, or representative offices	
	located in countries/regions against which UN,	No
	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have	No
	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based	No
9. TRAII	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions? NING & EDUCATION Does the Entity provide mandatory training, which	No
43	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sonctione ? NING & EDUCATION Does the Entity provide mandatory training, which includes:	
9. TRAII 43 43 a	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sourcine? NING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to	No Yes
43 43 a	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctione 2 NING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities	
43 43 a	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions? NING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money	Yes
43 43 a	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctinor? NING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions	
43 43 a 43 b	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions? NING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products	Yes
43 43 a 43 b	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions? NING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products Internal policies for controlling money	Yes
43 43 a 43 b	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctinor? NING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products Internal policies for controlling money laundering, terrorist financing and sanctions	Yes
43 43 a 43 b	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions? NING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products Internal policies for controlling money	Yes
43 43 a 43 b 43 c	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctinor? NING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products Internal policies for controlling money laundering, terrorist financing and sanctions	Yes
43 43 a 43 b 43 c	Iocated in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctine? NING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
43 43 a 43 b 43 c	Iocated in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctione? NING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g.	Yes Yes Yes
43 43 a 43 b 43 c 43 d	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sociance? NING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new	Yes Yes Yes
43 a 43 b 43 c 43 d 44	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctione? NING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes Yes Yes
43 43 a 43 b 43 c 43 d 44 a	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions? NING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Is the above mandatory training provided to :	Yes Yes Yes
43 43 a 43 b 43 c 43 d 44 a 44 a 44 b	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions? NING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Is the above mandatory training provided to : Board and Senior Committee Management	Yes Yes Yes Yes
43 43 a 43 b 43 c 43 d 44 a 44 a 44 b 44 c	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctione? NING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Is the above mandatory training provided to : Board and Senior Committee Management 1st Line of Defence	Yes Yes Yes Yes Yes Yes
43 43 a 43 b 43 c 43 d 44 a 44 a 44 b 44 c 44 d	Iocated in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sociance? NING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Is the above mandatory training provided to : Board and Senior Committee Management 1 st Line of Defence 2nd Line of Defence 3rd Line of Defence	Yes Yes Yes Yes Yes Yes Yes Yes Yes
43 43 a 43 b 43 c 43 d 44 a 44 a 44 b 44 c 44 d	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctione? NING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Is the above mandatory training provided to : Board and Senior Committee Management 1 st Line of Defence 2nd Line of Defence Third parties to which specific FCC activities	Yes Yes Yes Yes Yes Yes Yes
43 a 43 b 43 c 43 d 43 d 44 a 44 b 44 c 44 d 44 e	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sociance? NING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Is the above mandatory training provided to : Board and Senior Committee Management 1 st Line of Defence 2nd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers	Yes
43 a 43 b 43 c 43 d 43 d 44 a 44 b 44 c 44 d 44 e 44 f	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctione? NING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Is the above mandatory training provided to : Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors(consultants)	Yes Yes Yes Yes Yes Yes Yes Yes Yes
43 43 a 43 b 43 c 43 d 44 a 44 a 44 d 44 c 44 d 44 c 44 d 44 f 10. AUD	Iocated in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctione? NING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Is the above mandatory training provided to : Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants)	Yes
43 43 a 43 b 43 c 43 d 44 a 44 a 44 b 44 c 44 d	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sourcines? NING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Is the above mandatory training provided to : Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) In addition to inspections by the government	Yes
43 43 a 43 b 43 c 43 d 43 d 44 a 44 a 44 c 44 d 44 c 44 d 44 c 44 f 10. AUD	Iocated in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctione? NING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Is the above mandatory training provided to : Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants)	Yes
43 43 a 43 b 43 c 43 d 43 d 44 a 44 a 44 c 44 d 44 c 44 d 44 c 44 f 10. AUD	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sourcines? NING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Is the above mandatory training provided to : Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) In addition to inspections by the government	Yes
43 43 a 43 b 43 c 43 d 43 d 44 a 44 a 44 c 44 d 44 c 44 d 44 c 44 f 10. AUD	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sonctione? NING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Is the above mandatory training provided to : Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) DT	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
43 43 a 43 b 43 c 43 d 43 d 44 a 44 a 44 c 44 d 44 c 44 d 44 c 44 f 10. AUD	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sociance? NING & EDUCATION Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products Internal policies for controlling money laundering, terrorist financing and sanctions violations wisues that occur in the market, e.g. significant regulatory actions or new regulations Is the above mandatory training provided to : Board and Senior Committee Management 1 st Line of Defence 2 nd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other	Yes

Signature Page	
Wolfsberg Group Financial Crime Compliance Questionnair	e 2023 (FCCQ V1.2)
	(Financial Institution name)
Danial Augialla	
I, Daniel Auciello read and understood this	_ (Senior Compliance Manager- Second Line representative), certify that I have
declaration, that the answers provided in this Wolfsberg FC0	CQ are complete and correct to my honest belief.
Danisl Aucisllo	_ (Signature & Date)
5/21/2023	