

Financial Institution Name: Location (Country) :

BBM BANK LIMITED BAHAMAS

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

| No#        | Question   | Answer   |
|------------|--|--|
| 1. ENTITY  | & OWNERSHIP  |  |
| 1          | Full Legal Name  | BBM Bank Limited   |
|            |  |  |
|            |  |  |
|            |  |  |
| 2          | Append a list of foreign branches which are covered  | N/A  |
|            | by this questionnaire  |  |
|            |  |  |
|            |  |  |
| 3          | Full Legal (Registered) Address  | Goodman's Bay Corporate Centre - 3rd floor, West Bay Street and Sea View Drive - New |
|            |  | Providence, Bahamas - P.O. Box N-7507  |
|            |  |  |
|            |  |  |
| 4          | Full Primary Business Address (if different from   |  |
| 7          | above)   |  |
|            | above)   |  |
|            |  |  |
|            | Data of Fulfillians and the state of the sta |  |
| 5          | Date of Entity incorporation/establishment   | 05/14/1993   |
|            |  |  |
|            |  |  |
|            |  |  |
| 6          | Select type of ownership and append an ownership   |  |
|            | chart if available   |  |
| 6 a        | Publicly Traded (25% of shares publicly traded)  | No   |
| 6 a1       | If Y, indicate the exchange traded on and ticker   |  |
|            | symbol   |  |
|            |  |  |
|            |  |  |
| 6 b        | Member Owned/Mutual  | No 🔻   |
| 6 c        | Government or State Owned by 25% or more   | Yes  |
| 6 d        | Privately Owned  | No 🔽   |
| 6 d1       | If Y, provide details of shareholders or ultimate  |  |
|            | beneficial owners with a holding of 10% or more  |  |
|            |  |  |
|            |  |  |
| 7          | % of the Entity's total shares composed of bearer  |  |
| l <b>'</b> | shares   | 0%   |
|            | ondros   |  |
|            |  |  |
| •          | Describe Felitarian Challenge Inc.   |  |
| 8          | Does the Entity, or any of its branches, operate under   | Yes  |
|            | an Offshore Banking License (OBL)?   |  |
| 8 a        | If Y, provide the name of the relevant branch/es   | BBM Bank Limited   |
|            | which operate under an OBL   |  |
|            |  |  |
|            |  |  |
| 9          | Does the Bank have a Virtual Bank License or   | No 🔻   |
|            | provide services only through online channels?   |  |
| 10         | Name of primary financial regulator/supervisory  | Central Bank of Bahamas  |
|            | authority  |  |
|            |  |  |
|            |  |  |
| 11         | Provide Legal Entity Identifier (LEI) if available   | 5493001WWBCBCCDMD532   |
|            |  |  |
|            |  |  |
|            |  |  |
| 12         | Provide the full legal name of the ultimate parent (if   | Bank of Communications Co., Ltd.   |
|            | different from the Entity completing the DDQ)  | Dank of Communications Co., Etc.   |
|            | , , , ,  |  |
|            |  |  |
| <u> </u>   |  | 1  |

| 13  | Jurisdiction of licensing authority and regulator of ultimate parent   | The people's Bank of China - China Banking and Insurance Regulatory Comission                           |                |
|---|--|---|----------------|
| 14  | Select the business areas applicable to the Entity   |   |                |
| 14 a  | Retail Banking   | No  | _              |
| 14 b  | Private Banking  | No  |                |
| 14 c  | Commercial Banking   |   |                |
|   | Ţ.   | No .  |                |
| 14 d  | Transactional Banking  | Yes   |                |
| 14 e  | Investment Banking   | Yes   |                |
| 14 f  | Financial Markets Trading  | Yes   |                |
| 14 g  | Securities Services/Custody  | No  |                |
| 14 h  | Broker/Dealer  | No  | $\mathbf{V}$   |
| 14 i  | Multilateral Development Bank  | No  | $\blacksquare$ |
| 14 j  | Wealth Management  | No  |                |
| 14 k  | Other (please explain)   | N/A   |                |
| 15  | Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)  | Yes   | •              |
| 15 a  | If Y, provide the top five countries where the non-<br>resident customers are located.   | Brazil (100%)   |                |
| 16  | Select the closest value:  |   |                |
| 16 a  | Number of employees  | 1-50  |                |
| 16 b  | Total Assets   | Between \$100 and \$500 million   | =              |
| 17  | Confirm that all responses provided in the above   | Detween \$100 and \$300 million   | _=             |
|   | Section are representative of all the LE's branches.   | Yes   |                |
| 17 a  | If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional   |   |                |
| 10  | information/context to the answers in this section.  |   |                |
| 2. PRODI  | UCTS & SERVICES  |   |                |
| 19  |  |   |                |
| 1   | Does the Entity offer the following products and services:   |   |                |
| 19 a  | services:  | Να  |                |
| 19 a<br>19 a1   | services:  Correspondent Banking   | No No   |                |
| 19 a<br>19 a1<br>19 a1a   | services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking  | No Please select  |                |
| 19 a1   | services:  Correspondent Banking  If Y   |   |                |
| 19 a1<br>19 a1a   | services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to  | Please select   |                |
| 19 a1<br>19 a1a<br>19 a1b   | services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with  | Please select Please select   |                |
| 19 a1<br>19 a1a<br>19 a1b<br>19 a1c<br>19 a1d<br>19 a1e                     | services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  | Please select Please select Please select   |                |
| 19 a1<br>19 a1a<br>19 a1b<br>19 a1c   | services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships  | Please select Please select Please select Please select   |                |
| 19 a1<br>19 a1a<br>19 a1b<br>19 a1c<br>19 a1d<br>19 a1e                     | services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?  | Please select Please select Please select Please select Please select                                   |                |
| 19 a1<br>19 a1a<br>19 a1b<br>19 a1c<br>19 a1d<br>19 a1e                     | services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses  | Please select Please select Please select Please select Please select Please select                     |                |
| 19 a1<br>19 a1a<br>19 a1b<br>19 a1c<br>19 a1d<br>19 a1e<br>19 a1f           | services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider  | Please select  Please select  Please select  Please select  Please select  Please select  Please select |                |
| 19 a1<br>19 a1a<br>19 a1b<br>19 a1c<br>19 a1d<br>19 a1e<br>19 a1f<br>19 a1g | services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? | Please select Please select Please select Please select Please select Please select                     |                |

|                 | 1   | T             |   |
|-----------------|---|---------------|---|
| 19 a1i          | Does the Entity have processes and procedures in place to identify downstream relationships with  | Disconsider   |   |
|                 | MSBs/MVTSs/PSPs?  | Please select |   |
| 19 b            | Cross-Border Bulk Cash Delivery   | No E          | _ |
| 19 c            | Cross-Border Remittances  | No E          |   |
| 19 d            | Domestic Bulk Cash Delivery   | No E          |   |
| 19 e            | Hold Mail   | No D          |   |
| 19 f            | International Cash Letter   | No C          |   |
| 19 g            | Low Price Securities  | No C          |   |
| 19 h            | Payable Through Accounts  | No C          | I |
| 19 i            | Payment services to non-bank entities who may   |               |   |
|                 | then offer third party payment services to their customers?   | No            | _ |
| 19 i1           | If Y, please select all that apply below?   |               |   |
| 19 i2           | Third Party Payment Service Providers   | Please select |   |
| 19 i3           | Virtual Asset Service Providers (VASPs)   | Please select |   |
| 19 i4           | eCommerce Platforms   | Please select |   |
| 19 i5           | Other - Please explain  |               |   |
| 19 j            | Private Banking   | Both          |   |
| 19 k            | Remote Deposit Capture (RDC)  | No C          |   |
| 19 I            | Sponsoring Private ATMs   | No            |   |
| 19 m            | Stored Value Instruments  | No C          |   |
| 19 n            | Trade Finance   | Yes           |   |
| 19 o            | Virtual Assets  | No C          |   |
| 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   | No C          |   |
| 19 p1a          | If yes, state the applicable level of due diligence   | Please select |   |
| 19 p2           | Wire transfers  | No            |   |
| 19 p2a          | If yes, state the applicable level of due diligence   | Please select | l |
| 19 p3           | Foreign currency conversion   | No C          |   |
| 19 p3a          | If yes, state the applicable level of due diligence   | Please select |   |
| 19 p4           | Sale of Monetary Instruments  | P             |   |
| 19 p4a<br>19 p5 | If yes, state the applicable level of due diligence If you offer other services to walk-in customers  | Please select |   |
| 19 ро           | please provide more detail here, including describing the level of due diligence.   |               |   |
| 19 q            | Other high-risk products and services identified by the Entity (please specify)   |               |   |
| 20              | Confirm that all responses provided in the above Section are representative of all the LE's branches.                                       | Yes           | ▼ |
| 20 а            | If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  |               |   |
| 21              | If appropriate, provide any additional information/context to the answers in this section.  |               |   |
| 3. AML. C       | TF & SANCTIONS PROGRAMME  |               |   |
| 22              | Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:                     |               |   |
| 22 a            | Appointed Officer with sufficient experience/expertise  | Yes           |   |
| 22 b            | Adverse Information Screening   | Yes           |   |
| 22 c            | Beneficial Ownership  | Yes           |   |
| 22 d            | Cash Reporting  | No C          |   |
| 22 e            | CDD   | Yes           | ā |
| 22 f            | EDD   | Yes           |   |
| 22 g            | Independent Testing   | Yes           |   |
| 22 h            | Periodic Review   | Yes           | ā |
| 22 i            | Policies and Procedures   |               |   |
| 22 j            | PEP Screening   | Yes           |   |
| 22 k            | Risk Assessment   | Yes           |   |
| 22 I            | Sanctions   | Yes           |   |
| 22 1            |   | · · · ·       | _ |

| 22 n Training and Education  | 22 m   | Suspicious Activity Reporting  | Yes  |                |
|--|--------|--|--|----------------|
| AML CF & Sanctions policy approved at the Entity's ALL CFR & Sanctions policy approved atteats an anually by the Board receives and an anually by the Board receives are seen an anually by the Board receives are seen and analyse and analyse and analyse analyse and analyse analyse analyse analyse and analyse an |        |  |  | $\equiv$       |
| AMUL CITÉ à Sanctions Compliance Department?  AMUL CITÉ à Sanctions policy approved at least annually by the Board or equivalent Senior Management Commissée? If Medechée your policy of the Sanctions policy assess, and challenge in Cessation 29.  Does the Board nocinity assess, and challenge in Cessation 29.  Does the Entity use that praints the carry out any components of the AMUL CIT. 8. Sanctions programme?  AMUL CITÉ à Sanctions programme?  The Commission of the AMUL CITÉ & Sanctions programme?  The Commission of the AMUL CITÉ & Sanctions programme?  The Commission of the AMUL CITÉ & Sanctions programme?  The Commission of the AMUL CITÉ & Sanctions programme?  The Commission of the AMUL CITÉ & Sanctions programme?  The Commission of the Cité Sanctions of the Cité Sanctions programme?  The Commission of the Cité Sanctions of the Cité Sanctions programme?  The Commission of the Cité Sanctions of the Cité Sanctions programme?  The Commission of the Cité Sanctions of the Cité Sa | 22 o   | · ·  |  |                |
| at least annually by the Board or equivalent Senior Management Commisser's M. Assertion 291.  25 Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?  26 Does the Entity use third parties to carry out any components of the AML. CTF & Sanctions programme?  27 Does the Entity use third parties to carry out any components of the AML. CTF & Sanctions programme?  28 a If Y, provide further details  27 Does the entity have a whitelitebleare partie?  28 a If N, clarify which questions the differences relate to and the branchies that this applies to carry out any components of the AML. CTF whiteliteblear parties to carry out any components of the AML. CTF whiteliteblear parties to carry out any components of the AML. CTF whiteliteblear parties to carry out any components of the AML componen | 23     |  |  | <b>T</b>       |
| Page 1   | 24     | at least annually by the Board or equivalent Senior<br>Management Committee? If N, describe your practice  | Yes  | •              |
| components of its ANL, CTF & Sanctions programme?  If y, provide further details  Confirm that all responses provided in the above Section are representative of all the LEP branches Section are representative of all the LEP branches  If N, clarify which questions the difference's relate to and the branch'se that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  A. ANTI BRIBERY & CORRUPTION  If the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?  If the Entity documented policies and procedures consistent with applicable date and report bribery and corruption?  If the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?  If the Entity and corruption?  If the Entity of the Entity and the Entity of the Entity of the Entity and the Entity applicable of conditionaling the ABC programme? Yes  Does the Entity have adequate staff with appropriate levels of experience/separate is timplement the ABC programme?  If the Entity's ABC programme applicable to:  Does the Entity have and acquarted to influence and receiving of thorists of value, directly or indirectly, and advantage.  Includes a prohibition against the falsefication of books and records the may be within the Entity?  If the Entity's ABC programme?  If the Entity's ABC progra | 25     | regular reporting on the status of the AML, CTF, &   | Yes  | •              |
| 27 Does the entity have a whistlebicover policy? 28 Confirm that all responses provided in the above Section are representative of all the LEs branches Section are representative of all the LEs branches 28 a If N, clarify which questions the differencels relate to and the branches hat this applies to.  29 If appropriate, provide any additional information contents to the answers in this section.  29 If appropriate, provide any additional information contents to the answers in this section.  29 Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report theleval and compitation of the service of the set infinity and Sch standards?  30 Does the Entity have an enterprise wide programme that sets minimum ABC standards?  31 Does the Entity have dequaluse staff with appropriate levels of experiencelexperises to implement the ABC programme?  32 Does the Entity have adjusted ABC programme?  33 Does the Entity have adjusted a set in the propriate levels of experiencelexperises to implement the ABC programme?  34 Is the Entity abdition of the Control of the School of the Entity that and advantage.  35 Designed the Entity have adjoined to the Control of the School of the Control of the School of the S | 26     |  | No   | ▼              |
| Section are presentative of all the LE branches Section are presentative of all the LE branches  If N, clarify which questions the difference's relate to and the branches that this applies to.  If N, clarify which questions the difference's relate to and the branches that this applies to.  If N, clarify which questions the difference's relate to and the branches that this applies to.  If A, ANTI BRIBERY & CORRUPTION  I has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and computions?  I has the Entity have an enterprise wide programme that sets minimum ABC sclandards?  I has the Entity happointed a designated officer or officers with sufficient acyerience/expertise to implement the ABC programme?  I have been been been been been been been be   | 26 a   | If Y, provide further details  |  |                |
| Section are epresentative of all the LE's branches   Yes    If N. Clarify which questions the difference's relate to and the branch'es that this applies to.  If Appropriate, provide any additional informationicontext to the answers in this section.  A. ANTI BRIBERY & CORRUPTION  30   | 27     | Does the entity have a whistleblower policy?   | Yes  |                |
| and the branchies that this applies to.  29 If appropriate, provide any additional information/bonlex to the answers in this section.  4. ANTI BRIBERY & CORRUPTION  30 If as the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent (elect and report bribery and corruption?)  31 Does the Entity have an enterprise wide programme that sets minimum ABC standards?  32 If as the Entity appointed a designated officer or officers with sufficient experience/expertise programme phast sets minimum ABC standards?  33 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?  34 Is the Entity's ABC programme applicable to. So the Entity have a global ABC policy that:  35 Does the Entity have a global ABC policy that:  36 Does the Entity have a global ABC policy that:  37 Does the Entity have a global ABC policy that:  38 Includes an archanced requirements regarding interaction with public officials?  39 Includes a prohibition against the falsification of books and records (its may be within the ABC programme?)  39 Does the Entity have and ABC programme?  30 Does the Entity have and ABC programme?  31 Does the Entity have and ABC programme?  32 Does the Entity have and ABC programme?  33 Does the Entity have and ABC programme?  34 Last because of their ABC programme?  35 Does the Entity have and ABC programme?  36 Does the Entity have and ABC programme?  37 Does the Bendrif receive, assess, and challenge regular reporting on the status of the ABC programme?  39 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inhurent risk assessment?  40 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inhurent risk assessment?  | 28     |  | Yes  | -              |
| Information/context to the answers in this section.  | 28 a   | · · · · · · · · · · · · · · · · · · ·  |  |                |
| Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?  11 Does the Entity when an enterprise wide programme that sets minimum ABC standards?  12 Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?  13 Does the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?  13 Does the Entity average and the ABC programme?  14 Is the Entity's ABC programme applicable to:  15 Does the Entity have a global ABC policy that:  15 Does the Entity have a global ABC policy that:  15 Does the Entity have a global ABC policy that:  15 Does the Entity have a global ABC policy that:  15 Does the Entity have a global ABC policy that:  16 Does the Entity have a global ABC policy that:  17 Prohibits the springing of value, directly, if improperly intended to influence action or obtain an advantage.  18 Does the Entity have a global ABC policy or any other policy applicable to the Legal Entity?  19 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  19 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  20 Does the Entity have on the SBC programme?  21 Prohibits the springing that is the net results as the ABC programme?  22 Prohibits the global assessment?  23 Does the Entity have an ABC residual risk rating that is the net result as the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last Life months?  15 Does the Entity have an ABC residual risk rating that is the net result as the Entity's ABC Enterprise Wide Risk Assessment?  24 Does the Entity have an ABC residual risk rating that is the net result as Entity application to the Internet and the Internet a | 29     | *  | Q.22d. the Entity does not handle cash.                              |                |
| consistent with applicable ABC regulations and report bribery and corruption?  13 Does the Entity have an enterprise wide programme that sets minimum ABC standards?  14 Is the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?  15 Does the Entity have adequate staff with appropriate levels of experience/expertise in implement the ABC programme?  16 Levels of experience/expertise in implement the ABC programme?  17 Does the Entity have a global ABC policy that:  18 Is the Entity's ABC programme applicable to: 19 Does the Entity have a global ABC policy that:  19 Does the Entity have a global ABC policy that:  20 Does the Entity have a global ABC policy that:  21 Does the Entity have a global ABC policy that:  22 Does the Entity have a global ABC policy that:  23 Includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly indirected to influence action or obtain an advantage.  25 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)?  26 Dees the Entity have controls in place to monitor the effectiveness of their ABC programme?  27 Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  28 Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  29 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment (EWRA) been completed in the interent risk completed in the interent risk components detailed below:  20 Does the Entity's ABC ENTRA cover the inherent risk components detailed below:  21 Potential liability created by intermediaries and the inherent risk components detailed below:   | 4. ANT | I BRIBERY & CORRUPTION   |  |                |
| that sets minimum ABC standards?  78  79  78  79  78  79  78  79  79  79   | 30     | consistent with applicable ABC regulations and requirements to reasonably prevent, detect and  | Yes  | •              |
| officers with sufficient experience/expertise responsible for coordinating the ABC programme?  33 Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?  34 Is the Entity's ABC programme applicable to: 35 Does the Entity have a global ABC policy that: 35 a Prohibits the gliving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, improperly intended to influence action or obtain an advantage.  35 b Includes enhanced requirements regarding interaction with public officials?  35 c Includes a prohibition against the falsification of experiments of the ABC policy or any other policy applicable to the Legal Entity)?  36 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  37 Does the Board receive, assess, and challenge regular reporting on the status of the ABC policy or any other policy applicable to the Legal Entity?  38 Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  49 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC ENTERPRISE WIRA cover the inherent risk components detailed below:  40 Does the Entity's ABC ENTERPRISE | 31     |  | Yes  |                |
| levels of experience/expertise to implement the ABC programme?  34 Is the Entity's ABC programme applicable to: 35 Does the Entity have a global ABC policy that: 35 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.  35 Includes enhanced requirements regarding interaction with public officials?  35 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)?  36 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  37 Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  38 Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  39 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 Potential liability created by intermediaries and   | 32     | officers with sufficient experience/expertise  | Yes  |                |
| 35 Does the Entity have a global ABC policy that: 35 a Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.  35 b Includes enhanced requirements regarding interaction with public officials?  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)?  36 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  37 Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  38 Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  38 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?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  ▼es  ▼es  ▼es  ▼es  ▼es  ▼es  ▼es  ▼e   | 33     | levels of experience/expertise to implement the ABC  | Yes  | •              |
| 35 a Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly, if improperly intended to influence action or obtain an advantage.  35 b Includes enhanced requirements regarding interaction with public officials?  36 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?)  36 c Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  37 d Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  38 d Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  39 d Does the factive have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 d Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 a Potential liability created by intermediaries and  | 34     | Is the Entity's ABC programme applicable to:   | Both joint ventures and third parties acting on behalf of the Entity |                |
| includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.  35 b Includes enhanced requirements regarding interaction with public officials?  56 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)?  57 d Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  58 d Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  59 d Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 d Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 d Potential liability created by intermediaries and   |        | Does the Entity have a global ABC policy that:   |  | _              |
| interaction with public officials?  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)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Pes  Tes  Yes  Tes  Yes  Tes  Yes  Tes  T  | 35 a   | includes promising, offering, giving, solicitation or<br>receiving of anything of value, directly or indirectly,<br>if improperly intended to influence action or obtain | Yes  | •              |
| books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?  36 Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  37 Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  38 Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  38 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?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Yes  Yes  Yes   40 Potential liability created by intermediaries and   | 35 b   |  | Yes  | <b>V</b>       |
| effectiveness of their ABC programme?  7es  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Yes  Yes  Yes  Yes   | 35 с   | books and records (this may be within the ABC policy   | Yes  | •              |
| reporting on the status of the ABC programme?  38 Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  38 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?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 Potential liability created by intermediaries and   | 36     |  | Yes  | <b>V</b>       |
| Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Yes  Yes  | 37     |  | Yes  | <b>T</b>       |
| 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?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 Potential liability created by intermediaries and  | 38     | Has the Entity's ABC Enterprise Wide Risk Assessment   | Yes  | V              |
| is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 Potential liability created by intermediaries and  | 38 a   | If N, provide the date when the last ABC EWRA was  |  |                |
| components detailed below:  40 a Potential liability created by intermediaries and   | 39     | is the net result of the controls effectiveness and the  | Yes  | •              |
| 1 Van  | 40     |  | Yes  | $\blacksquare$ |
|  | 40 a   |  | Yes  | <b>T</b>       |

| 40 b   | Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries   | Yes  | •              |
|--|---|--|----------------|
| 40 с   | Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials   | Yes  | •              |
| 40 d   | Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions  | Yes  | _              |
| 40 e   | Changes in business activities that may materially increase the Entity's corruption risk  | Yes  | <b> </b>       |
| 41   | Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?   | Yes  | •              |
| 42   | Does the Entity provide mandatory ABC training to:  |  |                |
| 42 a   | Board and senior Committee Management   | Yes  |                |
| 42 b   | 1st Line of Defence   | Yes  |                |
| 42 c   | 2nd Line of Defence   | Yes  |                |
| 42 d   | 3rd Line of Defence   | Yes  |                |
| 42 e   | Third parties to which specific compliance activities subject to ABC risk have been outsourced  | No   | •              |
| 42 f   | Non-employed workers as appropriate (contractors/consultants)   | No   |                |
| 43   | Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?   | Yes  | <b>V</b>       |
| 44   | Confirm that all responses provided in the above Section are representative of all the LE's branches  | Yes  | <b>V</b>       |
| 44 a   | If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  |  |                |
| 45   | If appropriate, provide any additional information/context to the answers in this section.  | Q42e and Q42f: No compliance activity subject to ABC risk is outsourced. |                |
| 5. AML. C  | TF & SANCTIONS POLICIES & PROCEDURES  |  |                |
| 46   | Has the Entity documented policies and procedures   |  |                |
|  | consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:  |  |                |
| 46 a   | Money laundering  | Yes  |                |
| 46 b   | Terrorist financing   | Yes  |                |
| 46 c   | Sanctions violations  | Yes  |                |
| 47   | Are the Entity's policies and procedures updated at least annually?   | Yes  | $\blacksquare$ |
| 48   | Has the Entity chosen to compare its policies and   |  |                |
|  | procedures against:   |  |                |
| 48 a   | U.S. Standards  | No   |                |
| 48 a1  | U.S. Standards  If Y, does the Entity retain a record of the results?   | No Please select   |                |
| 48 a1<br>48 b  | U.S. Standards  If Y, does the Entity retain a record of the results?  EU Standards   |  |                |
| 48 a1<br>48 b<br>48 b1   | U.S. Standards  If Y, does the Entity retain a record of the results?  EU Standards  If Y, does the Entity retain a record of the results?  | Please select  |                |
| 48 a1<br>48 b<br>48 b1<br>49   | U.S. Standards  If Y, does the Entity retain a record of the results?  EU Standards  If Y, does the Entity retain a record of the results?  Does the Entity have policies and procedures that:  | Please select<br>No  |                |
| 48 a1<br>48 b<br>48 b1   | U.S. Standards  If Y, does the Entity retain a record of the results?  EU Standards  If Y, does the Entity retain a record of the results?  | Please select<br>No  |                |
| 48 a1<br>48 b<br>48 b1<br>49   | U.S. Standards  If Y, does the Entity retain a record of the results?  EU Standards  If Y, does the Entity retain a record of the results?  Does the Entity have policies and procedures that:  Prohibit the opening and keeping of anonymous   | Please select No Please select   |                |
| 48 a1<br>48 b<br>48 b1<br>49<br>49 a                                 | U.S. Standards  If Y, does the Entity retain a record of the results?  EU Standards  If Y, does the Entity retain a record of the results?  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   | Please select No Please select Yes                                       |                |
| 48 a1<br>48 b<br>48 b1<br>49<br>49 a                                 | U.S. Standards  If Y, does the Entity retain a record of the results?  EU Standards  If Y, does the Entity retain a record of the results?  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  | Please select No Please select  Yes                                      |                |
| 48 a1<br>48 b<br>48 b1<br>49<br>49 a<br>49 b                         | U.S. Standards  If Y, does the Entity retain a record of the results?  EU Standards  If Y, does the Entity retain a record of the results?  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   | Please select No Please select  Yes  Yes  Yes                            |                |
| 48 a1<br>48 b<br>48 b1<br>49<br>49 a<br>49 c<br>49 d                 | U.S. Standards  If Y, does the Entity retain a record of the results?  EU Standards  If Y, does the Entity retain a record of the results?  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 accounts/relationships with shell banks  Prohibit dealing with another entity that provides   | Please select No Please select  Yes  Yes  Yes  Yes                       |                |
| 48 a1<br>48 b<br>48 b1<br>49<br>49 a<br>49 b<br>49 c<br>49 d<br>49 e | U.S. Standards  If Y, does the Entity retain a record of the results?  EU Standards  If Y, does the Entity retain a record of the results?  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 accounts/relationships with shell banks  Prohibit dealing with another entity that provides services to shell banks  Prohibit opening and keeping of accounts for | Please select No Please select  Yes  Yes  Yes  Yes  Yes                  |                |

| 49 i   | Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees  | Yes  | •        |
|--|--|--|----------|
| 49 j   | Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk   | Yes  | •        |
| 49 k   | Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates   | Yes  | •        |
| 49   | Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship   | Yes  | •        |
| 49 m   | Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News  | Yes  |          |
| 49 n   | Outline the processes for the maintenance of<br>internal "watchlists"  | Yes  | •        |
| 50   | Has the Entity defined a risk tolerance statement or<br>similar document which defines a risk boundary<br>around their business?   | Yes  | •        |
| 51   | Does the Entity have record retention procedures that comply with applicable laws?   | Yes  | <b>V</b> |
| 51 a   | If Y, what is the retention period?  | 5 years or more  | _        |
| 52   | Confirm that all responses provided in the above<br>Section are representative of all the LE's branches  | Yes  |          |
| 52 a   | If N, clarify which questions the difference/s relate to and the branch/es that this applies to.   |  |          |
| 53   | If appropriate, provide any additional information/context to the answers in this section.   | Q47, Q48 and Q49: We benchmark our policies and procedures to international best practices (FATF and Wolfsberg recommendations). Q48: BBL uses Bahamian laws and, as it is part of the BOCOM BBM conglomerate, it also complies with Brazilian regulations and follows international practices, as well as Wolfsberg its |          |
| 6 AMI CT   | TF & SANCTIONS RISK ASSESSMENT   |  |          |
| 54   | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  |  |          |
| 54 a   | Client   | Yes  |          |
| 54 b   | Product  | Yes  |          |
| 54 c   | Channel  | Yes  |          |
| 54 d<br>55   | Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  | Yes  |          |
| 55 a   | Transaction Monitoring   | Yes  |          |
| 55 b   | Customer Due Diligence   | Yes  |          |
| 55 c   | DED Identification   |  |          |
| 55 d   | PEP Identification   | Yes  |          |
| 55 e   | Transaction Screening Name Screening against Adverse Media/Negative  | Yes  | <b>V</b> |
| 55 e   | Transaction Screening  Name Screening against Adverse Media/Negative News  | Yes<br>Yes   |          |
| 55 e<br>55 f   | Transaction Screening Name Screening against Adverse Media/Negative News Training and Education  | Yes Yes Yes  | <b>V</b> |
| 55 e<br>55 f<br>55 g   | Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance   | Yes Yes Yes Yes  | <b>V</b> |
| 55 e<br>55 f   | Transaction Screening Name Screening against Adverse Media/Negative News Training and Education  | Yes Yes Yes  | <b>V</b> |
| 55 e<br>55 f<br>55 g<br>55 h   | Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed   | Yes Yes Yes Yes Yes Yes Yes  |          |
| 55 e<br>55 f<br>55 g<br>55 h<br>56<br>56 a                                   | Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:  | Yes Yes Yes Yes Yes Yes Yes  |          |
| 55 e  55 f  55 g  55 h  56  56 a   | Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client   | Yes Yes Yes Yes Yes Yes Yes Yes Yes  |          |
| 55 e  55 f  55 g  55 h  56  56  57  57                                       | Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product   | Yes Yes Yes Yes Yes Yes Yes  |          |
| 55 e  55 f  55 g  55 h  56  56  57  57  57 a  57 b  57 c                     | Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel   | Yes  |          |
| 55 e  55 f  55 g  55 h  56  56  57  57 a  57 b  57 c  57 d                   | Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography   | Yes Yes Yes Yes Yes Yes Yes Yes Yes  |          |
| 55 e  55 f  55 g  55 h  56  56 a  57  57 a  57 b  57 c  57 d  58             | Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:                                    | Yes  |          |
| 55 e  55 f  55 g  55 h  56  56 a  57 a  57 c  57 d  58  58 a                 | Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence             | Yes  |          |
| 55 e  55 f  55 g  55 h  56  56 a  57  57 a  57 b  57 c  57 d  58  58 a  58 b | Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance | Yes  |          |
| 55 e  55 f  55 g  55 h  56  56 a  57 a  57 c  57 d  58  58 a                 | Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence             | Yes  |          |

|                        | Lu o :   |               |                |
|------------------------|--|---------------|----------------|
| 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 a                   | If N, provide the date when the last Sanctions<br>EWRA was completed.  |               |                |
| 60                     | Confirm that all responses provided in the above<br>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.  If appropriate, provide any additional |               |                |
|                        | information/context to the answers in this section.  |               |                |
| 7. KYC, CI             | DD 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           |                |
| 64 d                   | Ownership structure  | Yes           |                |
| 64 e                   | Product usage  | Yes           |                |
| 64 f                   | Purpose and nature of relationship   | Yes           |                |
| 64 g                   | Source of funds  | Yes           |                |
| 64 h                   | Source of wealth   | Yes           |                |
| 65                     | Are each of the following identified:  |               |                |
| 65 a                   | Ultimate beneficial ownership  | Yes           |                |
| 65 a1                  | Are ultimate beneficial owners verified?   | Yes           |                |
| 65 b                   | Authorised signatories (where applicable)  | Yes           |                |
| 65 c                   | Key controllers  | Yes           |                |
| 65 d                   | Other relevant parties   | Yes           |                |
| 66                     | What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?  | 10%           | lacksquare     |
| 67                     | Does the due diligence process result in customers receiving a risk classification?  | Yes           |                |
| 67 a                   | If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:                             |               |                |
| 67 a1                  | Product Usage  | Yes           |                |
| 67 a2                  | Geography  | Yes           |                |
| 67 a3                  | Business Type/Industry   | Yes           |                |
| 67 a4                  | Legal Entity type  | Yes           |                |
| 67 a5                  | Adverse Information  | Yes           | $\blacksquare$ |
| 67 a6                  | Other (specify)  | N/A           | _              |
| 68                     | For high risk non-individual customers, is a site visit a part of your KYC process?  | No            |                |
| 68 a                   | If Y, is this at:  |               |                |
| 68 a1                  | Onboarding   | Please select |                |
| 68 a2                  | KYC renewal  | Please select |                |
| 68 a3                  | Trigger event  | Please select |                |
| 68 a4                  | Other  | Please select |                |
| 68 a4a                 | If yes, please specify "Other"   |               |                |
| 69                     | Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?                                       | Yes           | •              |
| 00 -                   | MAX to the to the  |               |                |
| 69 a                   | If Y, is this at:  |               |                |
| 69 a<br>69 a1<br>69 a2 | If Y, is this at: Onboarding KYC renewal   | Yes<br>Yes    |                |

| CO - 2 | Trimen and the second  | Iv                                  | _              |
|--------|--|-------------------------------------|----------------|
| 69 a3  | Trigger event  | Yes                                 |                |
| 70     | What is the method used by the Entity to screen for Adverse Media/Negative News?   | Combination of automated and manual | •              |
| 71     | Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?   |                                     | •              |
| 71 a   | If Y, is this at:  |                                     |                |
| 71 a1  | Onboarding   | Yes                                 |                |
| 71 a2  | KYC renewal  | Yes                                 |                |
| 71 a3  | Trigger event  | Yes                                 |                |
| 72     | What is the method used by the Entity to screen PEPs?  | Combination of automated and manual |                |
| 73     | Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? | Yes                                 | •              |
| 74     | Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?   | Yes                                 | <b> </b>       |
| 74 a   | If yes, select all that apply:   |                                     |                |
| 74 a1  | Less than one year   | No                                  |                |
| 74 a2  | 1 – 2 years  | Yes                                 |                |
| 74 a3  | 3 – 4 years  | Yes                                 |                |
| 74 a4  | 5 years or more  | No                                  |                |
| 74 a5  | Trigger-based or perpetual monitoring reviews  | Yes                                 |                |
| 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  | EDD on risk-based approach          |                |
| 76 b   | Respondent Banks   | EDD on risk-based approach          | $\blacksquare$ |
| 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          | $\blacksquare$ |
| 76 d   | Extractive industries  | EDD on risk-based approach          |                |
| 76 e   | Gambling customers   | Prohibited                          | V              |
| 76 f   | General Trading Companies  | EDD on risk-based approach          | V              |
| 76 g   | Marijuana-related Entities   | Prohibited                          | T              |
| 76 h   | MSB/MVTS customers   | Prohibited                          | V              |
| 76 i   |  |                                     | V              |
|        | Non-account customers  | Prohibited                          | _              |
| 76 j   | Non-Government Organisations   | EDD on risk-based approach          |                |
| 76 k   | Non-resident customers   | EDD on risk-based approach          | lacksquare     |
| 76 I   | Nuclear power  | EDD on risk-based approach          |                |
| 76 m   | Payment Service Providers  | EDD on risk-based approach          |                |
| 76 n   | PEPs   | EDD on risk-based approach          |                |
| 76 o   | PEP Close Associates   | EDD on risk-based approach          | V              |
| 76 p   | PEP Related  | EDD on risk-based approach          |                |
| 76 q   | Precious metals and stones   | EDD on risk-based approach          | V              |
| 76 r   | Red light businesses/Adult entertainment   | Prohibited                          | V              |
| 76 s   | Regulated charities  | EDD on risk-based approach          |                |
| 76 t   | Shell banks  | Prohibited                          |                |
| 76 u   | Travel and Tour Companies  | EDD on risk-based approach          |                |
| 76 v   | Unregulated charities  | EDD on risk-based approach          | V              |
| 76 w   | Used Car Dealers   | EDD on risk-based approach          |                |
| 76 w   | Virtual Asset Service Providers  |                                     | <b>V</b>       |
| 76 y   | Other (specify)  | EDD on risk-based approach          |                |
| 77     | If restricted, provide details of the restriction  |                                     |                |
| 78     | Does EDD require senior business management and/<br>or compliance approval?  | Yes                                 | •              |
|        |  |                                     |                |

| 78 a       | If V indicate who provides the approval:  | D-di-  | _        |
|------------|---|--|----------|
| 76 a<br>79 | If Y indicate who provides the approval:  | Both   | 늗        |
| 79         | Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?  | Yes  | •        |
| 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<br>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   |  |          |
| 82         | If appropriate, provide any additional information/context to the answers in this section.  | Q76i: all customers are subject to onboarding due diligence process. |          |
| 8. MONIT   | ORING & 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?  | Automated  | •        |
| 84 a       | If manual or combination selected, specify what type of transactions are monitored manually   |  |          |
| 84 b       | If automated or combination selected, are internal system or vendor-sourced tools used?   | Vendor-sourced tools   | •        |
| 84 b1      | If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?   | idwall and WorldCheck  |          |
| 84 b2      | When was the tool last updated?   | < 1 year   | <b>T</b> |
| 84 b3      | When was the automated Transaction Monitoring application last calibrated?  | <1 year  | _        |
| 85         | Does the Entity have regulatory requirements to report suspicious transactions?   | Yes  | •        |
| 85 a       | If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?                               | Yes  | •        |
| 86         | Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? | Yes  | •        |
| 87         | Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?                     | Yes  | •        |
| 88         | Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?                              | Yes  | •        |
| 89         | Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?                                    | Yes  | •        |
| 90         | Confirm that all responses provided in the above Section are representative of all the LE's branches  | Yes  | <b>V</b> |
| 90 a       | If N, clarify which questions the difference/s relate to and the branch/es that this applies to   |  |          |
| 91         | If appropriate, provide any additional information/context to the answers in this section.  |  |          |
| 9 PAVME    | NT TRANSPARENCY   |  |          |
| 92         | Does the Entity adhere to the Wolfsberg Group   |  |          |
|            | Payment Transparency Standards?   | Yes  |          |

|                   | ID 4 5 0 1  |  |   |
|-------------------|---|--|---|
| 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  | V  | _ |
| 93 b              |   | Yes  | 믬 |
|                   | Local Regulations   | Yes  |   |
| 93 b1             | If Y, specify the regulation  | Please refer to the regulations listed on: Central Bank of Bahamasl website. |   |
| 93 с              | If N, explain   |  |   |
| 94                | Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?  | Yes  | • |
| 95                | Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?   | Yes  | • |
| 95 a              | If Y, does the Entity have procedures to include<br>beneficiary address including country in cross<br>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.  |  |   |
| 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<br>102 a1a | Are internal system of vendor-sourced tools used?  If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?  | Vendor-sourced tools idwall and 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<br>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 | lacksquare     |
| 106 с          | Office of Financial Sanctions Implementation HMT (OFSI)  | Used for screening customers and beneficial owners and for filtering transactional data | $\blacksquare$ |
| 106 d          | European Union Consolidated List (EU)  | Used for screening customers and beneficial owners and for filtering transactional data |                |
| 106 e          | Lists maintained by other G7 member countries  | Used for screening customers and beneficial owners and for filtering transactional data |                |
| 106 f          | Other (specify)  | N/A   |                |
| 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.   |   |                |
| 110            | If appropriate, provide any additional information/context to the answers in this section.   |   |                |
|                | NG & EDUCATION   |   |                |
| 111            | Does the Entity provide mandatory training, which includes:  |   |                |
| 111 a          | Identification and reporting of transactions to government authorities   | Yes   | lacksquare     |
| 111 b          | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  | Yes   | •              |
| 111 c          | Internal policies for controlling money laundering, terrorist financing and sanctions violations   | Yes   | $\blacksquare$ |
| 111 d          | New issues that occur in the market, e.g. significant regulatory actions or new regulations  | Yes   | $\blacksquare$ |
| 111 e          | Conduct and Culture  | Yes   |                |
| 111 f          | Fraud  | Yes   |                |
| 112            | Is the above mandatory training provided to:   |   |                |
| 112 a          | Board and Senior Committee Management  | Yes   |                |
| 112 b          | 1st Line of Defence  | Yes   |                |
| 112 c<br>112 d | 2nd Line of Defence  3rd Line of Defence   | Yes   |                |
| 112 d<br>112 e | Third parties to which specific FCC activities have been outsourced  | Yes Not Applicable  |                |
| 112 f          |  |   |                |
| 113            | 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?                                    | Not applicable  Yes   | <u> </u>       |
| 114            | Does the Entity provide customised training for AML, CTF and Sanctions staff?  | Yes   | <b>T</b>       |
| 114 a          | If Y, how frequently is training delivered?  | Annually  |                |
| 115            | Confirm that all responses provided in the above Section are representative of all the LE's branches   | Yes   | <b>V</b>       |
|                |  |   |                |

| and the branchies that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  Possible of the provided to all functions that have a now within the AMA, CFT and Sincetons provided to all functions that have a now within the AMA, CFT and Sincetons provided to all functions that have a report that the context of  | 115 a      | If N. clarify which guartiens the difference to relate to  |   |
|--|------------|--|---|
| Information/context to the answers in this section.  Program of the BSCOM BBM. Answers 1 to end it 121 state as 1 the applicable* because BBL. DAMK LTD does not have third parties conducting FFC activities.  112 Quality' ASSURANCE (COMPLIANCE TESTING)  113 Does the Entity have a program wide risk based Quality Assurance programs less than subject (institution).  114 Does the Entity have a program wide risk based (institution).  115 Quality and the transport of transport of the above Section are representative of all the LES branches.  116 August the Entity have a prosperate of the above Section are representative of all the LES branches.  117 ANDITY of the Entity have an expension in this section.  118 ANDITY of the Entity have an expension in this section.  119 a If appropriate, provide any additional without and the branches that this applies to.  110 And the branches that this applies to.  110 And the branches that this applies to.  111 ANDITY of the Entity Assurance of the Entity have an internal audit function, a testing function or other independent their party or both, that assesses FCC AMS. CFT, ABC, Fraud and Senctions programme by the following.  110 And the Entity Assurance and the Entity As | 115 a      | If N, clarify which questions the difference/s relate to and the branch/es that this applies to.   |   |
| Does the Entity have a program wide risk based Quality Assurance programs for financial name (separate from the independent Audit function)?   Ves   | 116        |  | program of the BOCOM BBM. Answers 112e and 112f state as "Not applicable" because BBL |
| Quality Assurance programme for financial crime (separate from the independent Audit function)?  118 Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?  119 a Confirm that all responses (separate from the independent Audit function)?  119 a II Audit function)?  110 a II Audit function are representative of all the LE's branches in the independent Audit function of all the LE's branches in the applies to and the branchies that this applies to.  110 a II Audit function that this applies to and the branchies that this applies to.  110 a In addition the inspections by the government supervisors/regulators, does the Entity have an imbrand audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions protests and practices on a regular basis?  112 a Internal Audit Department Very Very Very Very Very Very Very Very  | 12. QUALIT | TY ASSURANCE /COMPLIANCE TESTING   |   |
| Separate from the independent Audit function   7   | 117        | Does the Entity have a program wide risk based   |   |
| Compliance Tesing process (separate from the independent Audit function) 27  1119 Confirm that all responses provided in the above Section are representable of all the LES branches Section are representable of all the LES branches Section are representable of all the LES branches Section and the branches that this applies to.  1120 If appropriate, provide any additional information formation formation to be answers in this section.  113. AUDIT  1131 In addition to inspections by the government supervisorable pulsators, does the Entity have an intends addit function, a testing function or other contained and and the rector, a testing function or other contained and and the rector, a testing function or other independent purposes on a regular basing?  1122 How refers it be Entity audited on its AVIL CTF. ABC. Fund and Sanctions policies and practices on a regular boding areas:  1123 Internal Audit Department:  1124 Section of the Contained of the AVIL CTF. ABC. Fund and Sanctions policies and procedures  122 Internal Audit Department:  123 AMIL CTF. ABC. Fund and Sanctions policy and procedures  123 AMIL CTF. ABC. Fund and Sanctions policy and procedures  123 AMIL CTF. ABC. Fund and Sanctions policy and procedures  123 AMIL CTF. ABC. Fund and Sanctions policy and procedures  123 AMIL CTF. ABC. Fund and Sanctions policy and procedures  124 AMIL CTF. ABC. Fund and Sanctions policy and procedures  125 AMIL CTF. ABC. Fund and Sanctions policy and procedures  126 AMIL CTF. ABC. Fund and Sanctions policy and procedures  127 AMIL CTF. ABC. Fund and Sanctions policy and procedures  128 AMIL CTF. ABC. Fund and Sanctions policy and procedures  129 AMIL CTF. ABC. Fund and Sanctions policy and procedures  120 AMIL CTF. ABC. Fund and Sanctions policy and procedures  121 AMIL CTF. ABC. Fund and Sanctions policy and procedures  122 AMIL CTF. ABC. Fund and Sanctions policy and procedures  123 AMIL CTF. ABC. Fund and Sanctions policy and procedures  124 Amil CTF. ABC. Fund and Sanctions policy and procedures  125 AMIL CTF. ABC. F |            | (separate from the independent Audit function)?  | Yes   |
| Section are representative of all the LE's branches  In Addition to lice special content of the  |            | Compliance Testing process (separate from the independent Audit function)?   | Yes   |
| and the branchives that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  It addition to inspection by the government of the provides any additional information/context to the answers in this section.  It addition to inspection by the government of the provides and provides and the provides and the provides and provides on a regular basis?  It addition to inspection by the government of the provides and provides on a regular basis?  It addition to inspect this provide and Sanctions policies and provides on a regular basis?  It addition to inspect the provide and Sanctions policies and provides on a regular basis?  It also the provides and Sanctions programment of the provides and Sanctions programment of the following ureas:  It also be internal audit function or other independent third party cover the following ureas:  It also be internal audit function or other independent third party cover the following ureas:  It also be internal audit function or other independent third party cover the following ureas:  It also be internal audit function or other independent third party cover the following ureas:  It also be internal audit function or other independent third party cover the following ureas:  It also be internal audit function or other independent third party cover the following ureas:  It also be internal audit function or other independent third party cover the following ureas:  It also be internal audit function or other independent third party cover the following ureas the  |            | Section are representative of all the LE's branches  | Yes   |
| information/context to the answers in this section.  13. AUDIT  12. In addition to inspections by the government supervisor/regulators, does the Entity have an third supervisor/regulators, does the Entity have an and Sanctions policies and practices on a regular basis?  12. About 50. Fraud and Sanctions programme by the following.  12. About 50. External Third Party  12. Desternal Audit Department  12. External Third Party  12. External Third Party  12. Desternal Have 10 part and Sanctions policy and procedures  12. Desternal Entity audited on other independent third party cover the following areas:  12. Sovernance  | 119 a      |  |   |
| addition to inspections by the government supervisors/regulations, 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?  122 How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:  122 Internal Audit Department Yearly Yearly  123 Desternal Third Party Internal Audit Department Hird Party Internal Part  | 120        |  |   |
| addition to inspections by the government supervisors/regulations, 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?  122 How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:  122 Internal Audit Department Yearly Yearly  123 Desternal Third Party Internal Audit Department Hird Party Internal Part  | 13. AUDIT  | <u> </u>   |   |
| Fraud and Sanctions programme by the following:  122 a Internal Audit Department  123 b External Third Party  124 Does the internal audit function or other independent third party over the following areas:  125 a AML, CTF, ABC, Fraud and Sanctions policy and procedures  126 Enterprise Wide Risk Assessment  127 Yes  128 C Governance  129 C Governance  129 C Governance  120 C Governance  120 C Governance  121 C S Governance  122 S S Suspicious Activity Filing  123 F Reporting/Metrics & Management  124 Yes  125 C Confirm that all responses provided in the above section are representative of all the LE's branches  126 If appropriate, provide any additional information/context to the answers in this section.   | 121        | supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and | Yes   |
| 122 b   External Third Party   Yearly   Yearly   Tearly   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   Tearly   Tearly     | 122        |  |   |
| 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  123 b Enterprise Wide Risk Assessment  123 c Governance  123 c KYC/CDD/EDD and underlying methodologies  123 e Name Screening & List Management  123 e Name Screening & List Management  123 f Reporting/Metrics & Management Information  123 g Suspicious Activity Filling  123 h Technology  123 h Technology  123 h Technology  123 h Technology  123 h Transaction Screening including for sanctions  124 h Transaction Screening including for sanctions  125 c Other (specify)  126   | 122 a      | ·  | · ·   |
| third party cover the following areas:  AML_CTF,ABC, Fraud and Sanctions policy and procedures  procedures  Covernance  Covern |            | <u> </u>   | Yearly  |
| procedures    Procedures   Proc |            | third party cover the following areas:   |   |
| 123 c Governance Yes   |            | procedures   |   |
| 123 d   KYC/CDD/EDD and underlying methodologies   Yes   |            | •  |   |
| 123 e Name Screening & List Management Yes   |            |  |   |
| Reporting/Metrics & Management Information   Yes   | 123 e      | , ,  |   |
| 123 h Technology Yes   | 123 f      | <u> </u>   |   |
| 123 i Transaction Monitoring Yes 123 j Transaction Screening including for sanctions Yes 123 k Training & Education Yes 123 l Other (specify)  124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible  | 123 g      | Suspicious Activity Filing   | Yes   |
| 123 j Transaction Screening including for sanctions Yes 123 k Training & Education Yes 123 l Other (specify) N/A  124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  125 Confirm that all responses provided in the above section are representative of all the LE's branches  126 If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  |            |  |   |
| 123 k Training & Education Yes  Other (specify) N/A  124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  125 Confirm that all responses provided in the above section are representative of all the LE's branches  125 If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  14. FRAUD  127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible  |            |  |   |
| 124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  125 Confirm that all responses provided in the above section are representative of all the LE's branches  125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  13. FRAUD  14. FRAUD  15. Does the Entity have policies in place addressing fraud risk?  16. Does the Entity have a dedicated team responsible  |            |  |   |
| tracked to completion and assessed for adequacy and completeness?  Confirm that all responses provided in the above section are representative of all the LE's branches  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  Information/context to the answers in place addressing fraud risk?  Yes  Yes  Yes  Yes  Information/context to the answers in place addressing fraud risk?  Yes  Information/context to the answers in place addressing fraud risk?   | 123 I      | -  |   |
| section are representative of all the LE's branches  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  It. FRAUD  To Does the Entity have policies in place addressing fraud risk?  Does the Entity have a dedicated team responsible  Yes   | 124        | tracked to completion and assessed for adequacy  | Yes   |
| 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.  It. FRAUD  127 Does the Entity have policies in place addressing fraud risk?  Does the Entity have a dedicated team responsible  Yes  Table 128 Does the Entity have a dedicated team responsible  | 125        |  | Yes   |
| information/context to the answers in this section.  14. FRAUD  127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible   | 125 a      | If N, clarify which questions the difference/s relate to   |   |
| Does the Entity have policies in place addressing fraud risk?  Yes  Toes the Entity have a dedicated team responsible fraud risk?  | 126        |  |   |
| Does the Entity have policies in place addressing fraud risk?  Yes  Toes the Entity have a dedicated team responsible fraud risk?  | 14. FRAU   | ID   |   |
| Voc  | 127        | Does the Entity have policies in place addressing  | Yes   |
|  | 128        |  | Yes   |

|   | Does the Entity have real time monitoring to detect  | Yes   |
|---|--|---|
| 130   | fraud?  Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?   | Yes   |
| 131   | Confirm that all responses provided in the above section are representative of all the LE's branches   | Yes   |
| 131 a   | If N, clarify which questions the difference/s relate to and the branch/es that this applies to.   |   |
| 132   | If appropriate, provide any additional information/context to the answers in this section.   |   |
| Wolfsberg   | tion Statement  Group Correspondent Banking Due Diligence Questionnaire 2023 (CI n Statement (To be signed by Global Head of Correspondent Ban   | BDDQ V1.4)<br>king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of  |
|   | ,  |   |
| Anti- Mone  | ry Lauridering, Chief Compilance Officer, Global Head of Financial   | Crimes Compliance OR equivalent)  |
| BBM BAN   | IK LIMITED (Financial Institu  | ion name) is fully committed to the fight against financial crime and makes   |
| BBM BAN<br>every effo   | IK LIMITED (Financial Institut<br>rt to remain in full compliance with all applicable financial crime law  | 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.  |
| BBM BAN<br>every effo<br>The Finan  | IK LIMITED (Financial Institut<br>rt to remain in full compliance with all applicable financial crime law  | ion name) is fully committed to the fight against financial crime and makes   |
| BBM BAN<br>every effo<br>The Finan<br>legal and r   | IK LIMITED (Financial Institut rt to remain in full compliance with all applicable financial crime law cial Institution understands the critical importance of having effect egulatory obligations. cial Institution recognises the importance of transparency regarding   | 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.  |
| BBM BAN<br>every effo<br>The Finan-<br>legal and r<br>The Finan-<br>standards<br>The Finan-   | IK LIMITED (Financial Institution rt 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 regarding.   | tion name) is fully committed to the fight against financial crime and makes so, 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 arg 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.   |
| BBM BAN<br>every effo<br>The Finan<br>legal and r<br>The Finan<br>standards<br>The Finan<br>The inform                                      | IK LIMITED  (Financial Institut rt 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 regardir  cial Institution further certifies it complies with / is working to comp   | 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 an apparties 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. Will be updated no less frequently than every eighteen months.   |
| BBM BAN every effo The Finan legal and r The Finan standards The Finan The inform The Finan   | IK LIMITED (Financial Institution 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 regarding the compliance of transparency regarding to compliance 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 an apparties 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. Will be updated no less frequently than every eighteen months.   |
| BBM BAN every effo The Finan legal and r The Finan standards The Finan The inform The Finan I, CASSIG the answe Institution. I, OTAVI       | IK LIMITED (Financial Institution 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 regarding in the importance | 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 and 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. Will be updated no less frequently than every eighteen months.  In a timely basis.  |
| BBM BAN every effo The Finan legal and r The Finan The Finan The Finan The Finan I, CASSIG the answe Institution. I, OTAVI Wolfsberg Lossio | (Financial Institution 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 regarding cial Institution further certifies it complies with / is working to compliation provided in this Wolfsberg CBDDQ will be kept current and cial Institution commits to file accurate supplemental information of the cial Institution commits to file accurate supplemental information of the provided in this Wolfsberg CBDDQ are complete and correct to the complete and correct to the complete and correct to the complete and complete and correct to my honest belief, and that I   | tion name) is fully committed to the fight against financial crime and makes so, 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 and parties to transactions in international payments and has adopted/is committed to adopting these allow 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 the my honest belief, and that I am authorised to execute this declaration on behalf of the Financial invalent), certify that I have read and understood this declaration.  2024-09-26 |