

Financial Institution Name: Location (Country) :

BANK OF CHINA (BRASIL) BANCO MULTIPLO S/A BRAZIL/CAYMAN

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.

	terially different than its Entity Head Office, a separate questionnaire can	
No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	
		BANK OF CHINA (BRASIL) BANCO MULTIPLO S/A
		BAIN OF CHINA (BRASIL) BANCO MOLTIFLO S/A
2	Append a list of foreign branches which are covered by	
	this questionnaire	
		BANK OF CHINA (BRASIL) BANCO MULTIPLO S/A - GRAND CAYMAN BRANCH - CAYMAN
3	Full Legal (Registered) Address	
3	Tuli Legal (Negistered) Address	N
		Alameda Santos, number 960, Floors 13º, 15º and 16º - Cerqueira César - São Paulo/SP
		P.O1353 Harbour Place, 5o Floor 103 Church Street, George Town Grand Cayman KY1-1108 - Cayman
4	Full Primary Business Address (if different from above)	
		Not Applicable
		TWO Applicable
5	Date of Entity incorporation/establishment	
		07/18/72 Brazil
		01/31/02 Cayman
		- · - · · · · · · · · · · · ·
6	Select type of ownership and append an ownership chart	
J	if available	
	II.	N.
6 a 6 a1	Publicly Traded (25% of shares publicly traded) If Y, indicate the exchange traded on and ticker	No .
6 a1		
	symbol	Not Applicable
		Телентин
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	Bank of China Limited
		CCB Brasil Financial Holding Investimentos e Participações LTDA.
7	% of the Entity's total shares composed of bearer shares	
•	70 of the Emily of total offaces composed of Societ chares	
		0,00%
8	Does the Entity, or any of its branches, operate under an	Yes
	Offshore Banking License (OBL)?	
8 a	If Y, provide the name of the relevant branch/es which	
	operate under an OBL	BANK OF CHINA (BRASIL) BANCO MULTIPLO S/A - Cayman Branch - Cayman
		2
9	Does the Bank have a Virtual Bank License or provide	no
	services only through online channels?	
10	Name of primary financial regulator/supervisory authority	
		BACEN - Central Bank of Brazil - Brazil
		CIMA - Cayman Islands Monetary Authority, License no 100060 - Cayman
11	Provide Legal Entity Identifier (LEI) if available	
		LEI is 254900Y5QNMJ8Q7VRW72 - Brazil
		LEI is 254900888UCSAN4N4Q57 - Cayman
12	Provide the full legal name of the ultimate parent (if	
12	different from the Entity completing the DDQ)	
	umerent from the Entity completing the DDQ)	Bank of China Limited
13	Jurisdiction of licensing authority and regulator of ultimate	
	parent	
		China Banking Regulatory Commission and People's Bank of China
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b	Private Banking	No No
140	i invate banking	liso .

14 c	Commercial Banking	Yes
14 d	Transactional Banking	No
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	No No
	Broker/Dealer	
14 h		No .
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	
		Not Applicable
45	D th- F-th-h	
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-	No
	resident means customers primarily resident in a different	
	jurisdiction to the location where bank services are	
	provided)	
15 a	If Y, provide the top five countries where the non-	
	resident customers are located.	Alas Annihanta
		Not Applicable
40	Colors the algorithms	
16	Select the closest value:	004 500
16 a	Number of employees	201-500
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches.	165
17 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
		Not Applicable
18	If appropriate, provide any additional information/context	
18	If appropriate, provide any additional information/context to the answers in this section.	
18		Not Applicable
18		Not Applicable
	to the answers in this section.	Not Applicable
	to the answers in this section. CTS & SERVICES	Not Applicable
	to the answers in this section.	Not Applicable
2. PRODU	to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services:	
2. PRODU	to the answers in this section. CTS & SERVICES	Not Applicable No
2. PRODU	to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services:	
2. PRODU 19	to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking	No
2. PRODU 19 19 a 19 a	to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y	
2. PRODU 19 19 a 19 a	to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking	No No
2. PRODU 19 19 a 19 a 19 a1 19 a1a	to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to	No
2. PRODU 19 19 a 19 a 19 a1 19 a1a	to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships?	No No
2. PRODU 19 19 a 19 a 19 a1 19 a1a	to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to	No No
2. PRODU 19 19 a 19 a 19 a1 19 a1a	to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with	No No
2. PRODUC 19 19 a 19 a 19 a1 19 a1a 19 a1b	to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	No No No No
2. PRODU 19 19 a 19 a 19 a1 19 a1a	to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking	No No
2. PRODUCT 19 19 a 19 a1 19 a1a 19 a1b 19 a1c	to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks?	No No No No No No No
2. PRODUC 19 19 a 19 a 19 a1 19 a1a 19 a1b	to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships	No No No No
2. PRODUC 19 19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c	to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks?	No No No No No No No
2. PRODUCT 19 19 a 19 a1 19 a1a 19 a1b 19 a1c	to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to the Entity have processes and procedures in the foreign banks?	No No No No No No No
2. PRODUC 19 19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c	to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with	No No No No No No No
2. PRODUC 19 19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f	to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	No No No No No No No
2. PRODUC 19 19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c	to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity offer Correspondent Banking	No
2. PRODUC 19 19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f	to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity forer Correspondent Banking services to regulated Money Services Businesses	No No No No No No No
2. PRODUC 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1f	to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	No
2. PRODUC 19 19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f	to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity forer Correspondent Banking services to regulated Money Services Businesses	No
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2. PRODUC 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1f	to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity 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	No
2. PRODUC 19 19 a 19 a1 19 a1a 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f 19 a1g	to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow 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)?	No N
2. PRODUCT 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f 19 a1f 19 a1f 19 a1g 19 a1h 19 a1	to the answers in this section. CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity forer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? MSBs	No N

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

	T -	
22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML,	1-10
	CTF & Sanctions Compliance Department?	
24	Is the Entity's AML, CTF & Sanctions policy approved at	
	least annually by the Board or equivalent Senior	Yes
	Management Committee? If N, describe your practice in Question 29.	
25	Does the Board receive, assess, and challenge regular	
20	reporting on the status of the AML, CTF, & Sanctions	Yes
	programme?	
26	Does the Entity use third parties to carry out any	.,
	components of its AML, CTF & Sanctions programme?	Yes
26 a	If Y, provide further details	
		The BANK OF CHINA (BRASIL) BANCO MULTIPLO S/A uses the SIRCOI system provided by the vendor FATO
		and the Transaction Screening system provided by the vendor Swift. Both companies are subject to the policies
		and procedures of BOC Brasil.
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section	
20	are representative of all the LE's branches	Yes
28 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
		Not Applicable
29	If appropriate, provide any additional information/context	
23	to the answers in this section.	
		Not Applicable
4 45	L CONTRACTOR CONTRACTO	
	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and	Yes
	requirements to reasonably prevent, detect and report bribery and corruption?	
31	Does the Entity have an enterprise wide programme that	
31	sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers	
	with sufficient experience/expertise responsible for	Yes
	coordinating the ABC programme?	
33	Does the Entity have adequate staff with appropriate	
	levels of experience/expertise to implement the ABC	Yes
	programme?	
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35 35 a	Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This	
35 a	includes promising, offering, giving, solicitation or	
	receiving of anything of value, directly or indirectly, if	Yes
	improperly intended to influence action or obtain an	
	advantage	
35 b	Includes enhanced requirements regarding interaction	Yes
	with public officials?	165
35 c	Includes a prohibition against the falsification of books	
	and records (this may be within the ABC policy or any	Yes
	other policy applicable to the Legal Entity)?	165
36	Does the Entity have controls in place to monitor the	Yes
	effectiveness of their ABC programme?	100
37	Does the Board receive, assess, and challenge regular	Yes
	reporting on the status of the ABC programme?	
38	Has the Entity's ABC Enterprise Wide Risk Assessment	
	(EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was	
	completed.	Not Applicable
		THE PRIVATE OF THE PR
39	Does the Entity have an ABC residual risk rating that is	
	the net result of the controls effectiveness and the	Yes
40	inherent risk assessment?	
40	Does the Entity's ABC EWRA cover the inherent risk	
40 a	components detailed below: Potential liability created by intermediaries and other	
то а	third-party providers as appropriate	Yes
40 b	Corruption risks associated with the countries and	
	industries in which the Entity does business, directly or	Yes
	through intermediaries	
40 c	Transactions, products or services, including those	
	that involve state-owned or state-controlled entities or	Yes
40 -1	public officials	
40 d	Corruption risks associated with gifts and hospitality,	Yes
	hiring/internships, charitable donations and political contributions	165
	CONTRIBUTION	

40 e	Changes in business activities that may materially	Yes
	increase the Entity's corruption risk	100
41	Does the Entity's internal audit function or other	
	independent third party cover ABC Policies and	Yes
	Procedures?	
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities	
42.0	subject to ABC risk have been outsourced	Yes
42 f	Non-employed workers as appropriate	
721	(contractors/consultants)	Yes
43	Does the Entity provide ABC training that is targeted to	
43	specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to	
44 a	and the branch/es that this applies to.	
	and the branchives that this applies to.	Not Applicable
45	If appropriate, provide any additional information/context	
	to the answers in this section.	
	to the districts in the obstain	Not Applicable
		••
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	165
47	annually?	Yes
40	Has the Entity chosen to compare its policies and	
48		
	procedures against:	N.
48 a	U.S. Standards	Yes
48 a1		
	If Y, does the Entity retain a record of the results?	Yes
48 b	EU Standards	Yes Yes
48 b 48 b1	EU Standards If Y, does the Entity retain a record of the results?	Yes
48 b	EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that:	Yes Yes
48 b 48 b1	EU Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes
48 b 48 b1 49	EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that:	Yes Yes
48 b 48 b1 49	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	Yes Yes Yes Yes
48 b 48 b1 49 49 a	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	Yes Yes Yes
48 b 48 b1 49 49 a	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	Yes Yes Yes Yes Yes Yes
48 b 48 b1 49 49 a	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	Yes Yes Yes Yes
48 b 48 b1 49 49 a	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	Yes Yes Yes Yes Yes Yes
48 b 48 b1 49 49 a 49 b 49 c	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	Yes Yes Yes Yes Yes Yes Yes Yes Yes
48 b 48 b1 49 49 a 49 b	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	Yes Yes Yes Yes Yes Yes Yes
48 b 48 b1 49 49 a 49 b 49 c 49 d 49 e	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	Yes
48 b 48 b1 49 49 a 49 b 49 c	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 Section	Yes Yes Yes Yes Yes Yes Yes Yes Yes
48 b 48 b1 49 49 a 49 c 49 c 49 d 49 e	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 Section 311 designated entities	Yes
48 b 48 b1 49 49 a 49 b 49 c 49 d 49 e	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 Section 311 designated entities Prohibit opening and keeping of accounts for any of	Yes
48 b 48 b1 49 49 a 49 c 49 c 49 d 49 e	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 Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges	Yes
48 b 48 b1 49 49 a 49 c 49 c 49 d 49 e	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 Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or	Yes
48 b 48 b1 49 49 a 49 b 49 c 49 d 49 e 49 f 49 g	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 dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
48 b 48 b1 49 49 a 49 c 49 c 49 d 49 e	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 Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Assess the risks of relationships with domestic and	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
48 b 48 b1 49 49 a 49 b 49 c 49 d 49 e 49 f 49 g	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 dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes

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antitionages 49 I Defen the process in where appropriates, for terminaling esting outsiner relationships due to infrarcial crims 49 I Defen the process for enging dients for immark 40 I Defen the process for enging dients for immark 40 I Defen the process and required in some in the control of the process and reviews the engine of the control of the process and reviews the engine of the control of the process and reviews the engine of the control of the process and reviews the engine of the control of the process and reviews the engine of the control of the process and reviews the engine of the control of the process and reviews the engine of the control of the process and reviews the engine of the control of the process and reviews the engine of the control of the process and reviews the engine of the control of the process and reviews the engine of the control of the process and reviews the engine of the engine o	401		Yes
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### Contract Process for existing clients for Financial critics reasons that suggest across the ority, including critics reasons that suggest across the ority including critics reasons that suggest across the ority including critics reasons that suggest across the state of the critical critics reasons of the pose to re-establish a cultivariation critics reasons if they seek for re-establish a cultivariation critics reasons if they seek for re-establish a cultivariation critics reasons if they seek for re-establish a cultivariation critics reasons in the process for the maintenance of internal reasons are considered which defense a reak boundary around stricts occurred which defense a reak boundary around some considered with corred with production and the first flive record elements procedures that corred with supplicable base? 51 a If Y, what is the neteration priority? 52 a If Y, what is the neteration priority? 53 a If Ageorphists, provide any additional information/bontext to the undown in this section. 54 a Client Clarent Course of the correct of the priority of the undown in this section. 55 Does the Entity's Ault, & CTF EWFA cover the inherent risk components detailed below. 56 A Client Clarent Course of the correct of		existing customer relationships due to financial crime	Yes
### Contract Process for existing clients for Financial critics reasons that suggest across the ority, including critics reasons that suggest across the ority including critics reasons that suggest across the ority including critics reasons that suggest across the state of the critical critics reasons of the pose to re-establish a cultivariation critics reasons if they seek for re-establish a cultivariation critics reasons if they seek for re-establish a cultivariation critics reasons if they seek for re-establish a cultivariation critics reasons in the process for the maintenance of internal reasons are considered which defense a reak boundary around stricts occurred which defense a reak boundary around some considered with corred with production and the first flive record elements procedures that corred with supplicable base? 51 a If Y, what is the neteration priority? 52 a If Y, what is the neteration priority? 53 a If Ageorphists, provide any additional information/bontext to the undown in this section. 54 a Client Clarent Course of the correct of the priority of the undown in this section. 55 Does the Entity's Ault, & CTF EWFA cover the inherent risk components detailed below. 56 A Client Clarent Course of the correct of		risk	
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49 m Duttine the processes regarding screening for sanchins, PEPs and Adverse Media/Negative News 49 n Duttine the processes for the maintenance of intenal varieties. 50 Has the Early defined a risk brainer statement or the processes of the maintenance of intenal varieties. The Early defined a risk brainer statement or the brainers statement or the brainers. 51 Does the Early sheer encord retenation procedures that composity along the processes of the process		crime reasons if they seek to re-establish a	
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sanctions, PEPs and Adverse Media/Negative News 4n	49 m	Outline the processes regarding screening for	
Cuttine the processes for the maintenance of internal vestibilities. 50 Has the Entity defined a risk tolerance statement or similar document which defines a risk bound are control their business? 51 Deservation of their business? 52 Confirm that all responses provided in the above Section are representative of all the LE's branches 52 Confirm that all responses provided in the above Section are representative of all the LE's branches 53 If you which questions he definer noise to and the branches of			Yes
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smilar document which defines a risk boundary around their beginness? 51 Does the Entity have record retention procodures that control with applicable tear? 52 Confirm that all responses provided in the above Section are representative of all the LES branches 52 a If It, Carly which supplies to. Not Applicable 53 If appropriate, provide any additional information-tontext to the answers in this section. Not Applicable 6. AML, CIT & SANCTIONS RISK ASSESSMENT 54 Does the Entity's AML & CIT EVRA cover the inherent risk components detailed below. 55 A Clean. 56 Ceorgraphy 57 Centomer Dub Diligence 58 C Defi It identification 59 Name Screening against Adverse Media/Negative Not Applicable 79 Name Screening against Adverse Media/Negative Notes 51 Training and Education Notes 79 Does the Entity's AML & CIT EWRA been completed in the straining and European Components detailed below. 79 Name Screening against Adverse Media/Negative Notes 52 Description 79 Name Screening against Adverse Media/Negative Notes 53 Description 79 Notes 54 Clean 79 Does the Entity's AML & CIT EWRA been completed in the less 152 morphis? 79 Description 79 Descr	50	Has the Entity defined a risk tolerance statement or	
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51 a			1.33
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risk components detailed below: 57 a Client Yes 57 b Product Yes 57 c Channel Yes 57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
57 a Client Yes 57 b Product Yes 57 c Channel Yes 57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 55 a 55 a 55 c 55 c 55 c 55 f 55 c 55 f 55 d 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
57 a Client Yes 57 b Product Yes 57 c Channel Yes 57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 55 a 55 a 55 c 55 c 55 c 55 f 55 c 55 f 55 d 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
57 b Product Yes 57 c Channel Yes 57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 55 a 55 a 55 c 55 c 55 c 55 f 55 c 55 f 55 d 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
57 c Channel Yes 57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 f 55 d 55 f 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes Not Applicable
58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 c 55 f 55 d 55 f 55 f 55 f 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes Not Applicable Yes Yes
effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 f 55 g 55 d 56 a 57 a 57 a 57 a 57 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Yes
58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 a 55 b 55 c 55 d 55 c 55 d 55 e 55 f 55 a 55 7 57 a 57 a 57 c 57 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes Yes
58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 a 55 b 55 c 55 d 55 c 55 d 55 e 55 f 55 a 55 7 57 a 57 a 57 c 57 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	Yes Yes
58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 a 55 b 55 c 55 d 55 c 55 d 55 e 55 f 55 a 55 7 57 a 57 a 57 c 57 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes Yes
58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 c 55 d 55 c 55 d 55 6 56 a 57 a 57 a 57 b 57 c 57 d 58	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes Yes Yes Yes Yes Yes Yes Yes Yes Not Applicable Yes Yes Yes Yes Yes Yes Yes Yes Yes
	54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
30 u maragement illorination 165	54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 a 55 b 55 c 55 d 55 c 55 d 55 a 55 f 55 c 55 d 55 c 55 f 55 g 55 h 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes
	54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 a 55 b 55 c 55 d 55 c 55 d 55 e 55 f 55 a 55 f 55 c 55 7 57 a 57 a 57 b 57 c 57 d 58 58 a 58 a 58 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance List Management	Yes

	1 N 0 ·	V
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 EWRA	
	was completed.	
	·	Not Applicable
	Confirm that all responses provided in the other of	
60	Confirm that all responses provided in the above Section	Yes
60.0	are representative of all the LE's branches If N, clarify which questions the difference/s relate to	
60 a	and the branch/es that this applies to.	
	and the branchives that this applies to.	Not Applicable
61	If appropriate, provide any additional information/context	
	to the answers in this section.	
		Not Applicable
7 KYC CI	DD and EDD	
	Does the Entity verify the identity of the customer?	Yes
62 63	Do the Entity's policies and procedures set out when	100
บง	CDD must be completed, e.g. at the time of onboarding	Yes
	or within 30 days?	100
64	Which of the following does the Entity gather and retain	
J-	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%
67	Does the due diligence process result in customers	Von
	receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the	
	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	
		Not Applicable
		ποι προιοασίο
68	For high risk non-individual customers, is a site visit a part	Voc
	of your KYC process?	Yes
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4	Other	No
68 a4a	If yes, please specify "Other"	
		Nier Ann Contri
		Not Applicable
69	Does the Entity have a risk based approach to screening	
33	customers for Adverse Media/Negative News?	Yes
	sastamento for Adverse Media/Negative News:	***
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	Combination of automated and manual
	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	L.
	they are PEPs, or controlled by PEPs?	Yes
	11.0y 4.0 1 21 0, 01 001.11.01.04 by 1 21 01	
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
		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	Yes
	they are PEPs, or controlled by PEPs?	
	they are i Er 3, or controlled by i Er 3:	
74	Is KYC renewed at defined frequencies based on risk	
, ,	rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	Voc
		Yes
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
		Not Applicable
75	Does the Entity maintain and report metrics on current	L.
	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
		EDD on risk-based approach
76 b1	If EDD or restricted, does the EDD assessment	
	contain the elements as set out in the Wolfsberg	Yes
	Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	EDD on risk-based approach
76 e	Extractive industries Gambling customers	Prohibited
	Extractive industries	
76 e	Extractive industries Gambling customers	Prohibited
76 e 76 f 76 g	Extractive industries Gambling customers General Trading Companies	Prohibited EDD on risk-based approach
76 e 76 f 76 g 76 h	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers	Prohibited EDD on risk-based approach Prohibited Prohibited
76 e 76 f 76 g 76 h 76 i	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers	Prohibited EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 j	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations	Prohibited EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 j 76 k	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers	Prohibited EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power	Prohibited EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited
76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 m	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 m 76 n	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 i 76 k 76 l 76 m 76 n 76 o	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 k 76 l 76 n 76 n 76 o 76 p	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 q	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 k 76 l 76 n 76 n 76 o 76 p	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 q	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 i 76 k 76 i 76 n 76 n 76 o 76 o 76 q 76 q	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 i 76 n 76 n 76 n 76 o 76 p 76 q 76 s 76 t	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 i 76 n 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 n 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 k 76 i 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 v	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 k 76 n 76 n 76 n 76 o 76 p 76 g	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 k 76 i 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 v	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 k 76 n 76 n 76 n 76 o 76 p 76 g	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 k 76 n 76 n 76 n 76 o 76 p 76 g	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 k 76 n 76 n 76 n 76 o 76 p 76 g	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 k 76 i 76 n 76 n 76 o 76 p 76 c 76 g 76 c 76 c 76 y 76 y	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 k 76 n 76 n 76 n 76 o 76 p 76 g	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 k 76 i 76 n 76 n 76 o 76 p 76 c 76 g 76 c 76 c 76 y 76 y	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited Not Applicable
76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 k 76 i 76 n 76 n 76 o 76 p 76 c 76 g 76 c 76 c 76 y 76 y	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited
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Complance Complance			
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accountants, consultants, real estate agents? 8 Does the Entity perform an additional control or quality review on details subsect to EDD? 81 a	79		Von
review on clearly subject to EDD? 10 Confirm that all response provided in the above Section are processorable of all the LES branches 11 II I			Tes
18 a If N, carry which questions the officercos relate to and the branches that which applies to Mor Applicable Mor	80		Yes
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S. MONITORING & REPORTING		and the branch/es that this applies to	Not Applicable
S. MONITORING & REPORTING			
S. MONITORING & REPORTING	82	If appropriate, provide any additional information/context	
8. MONITORING & REPORTING 8 Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting ves many processes of the identification and reporting ves that is the method used by the Entity how mentor transactions for suspicious activities? 84 a If manual or combination selected, specify what by porting transactions are monitored manually not Applicable 84 b If automated or combination selected, specify what by porting the specific processes are monitored manually not Applicable 84 b If automated or combination selected, are internal system or vendor-sourced tools used? 84 b If wendor-sourced tool or sold selected, what is the name of the vendor/bool? 84 b When was the tool last updated? 85 c When was the submated Transaction Monitoring application last calibrated? 85 a When was the submated Transaction Monitoring application last calibrated? 85 a When was the submated Transaction Monitoring application last calibrated? 86 b Does the Entity have policies, procedures and processes to review and escalation matters arising from the monitoring of customer transactions and activity? 87 Does the Entity have policies, procedures and processes to be the Entity have processes in place to respond to Request For Information (RFIs) to their customers in a Request For Information (RFIs) from the monitoring of customer transactions and activity? 89 Does the Entity have processes in place to send Request For Information (RFIs) from other entities in a transaction and entities in a transaction and entities in the sequest For Information (RFIs) from other entities in a transaction and the brancholes that this applies to Not Applicable 90 a If N, Calify which questions the difference's relate to another processes in this section are representative of all the LES transactions. 91 If appropriate, provide any additional information/context to the answers in this section. 92 Does the Entity have been to the Wolfsberg Group Payment vestimes.		to the answers in this section.	Not Applicable
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Based on the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity? Automated	o Monuta	DING & DEPORTING	
monitoring processes for the identification and reporting of suspicious activities? 84 a What is the method used by the Entity to monitor transactions for suspicious activities? 84 a If manual or combination selected, specify what type of transactions are unable to monitored manually not Applicable 84 b If sudomated or combination selected, are internal system or vendor-sourced tools used? 84 b1 If vendor-sourced tool or Both selected, what is the name of the vendor/hoor? 85 ISECOI 86 b2 When was the coll last updated? 86 When was the automated Transaction Monitoring spoliation last callestrated? 87 Does the Entity have policies, procedures and processes to creive and escalate matters arising from the monitoring of customer transactions and activity? 87 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 88 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 89 Does the Entity have processes in place to respond to Request For Information (RFIs) to mother entities in a transaction are substituted to monitoring? 89 Does the Entity have processes in place to send Request For Information (RFIs) to mother entities in a transaction are substituted to monitoring of customer transactions are substituted to monitoring of the place to send Request For Information (RFIs) to mother entities in a transaction are representative of all the LFs branches 80 Does the Entity have processes in place to send Request for Information (RFIs) to mother entities in a transaction are representative of all the LFs branches 81 If appropriate, provide any additional information/context to the arraws in this section. 82 Not Applicable 83 Description and the branches to the Wolfsberg Group Payment (Ves			
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### Application last calibrated? ### Does the Entity have policies, procedures and processes to comply with suspicious transaction report suspicious transactions? ### Bapting application last calibrated? ### Bapting application last calibrated and calibrated last calibrated and calibrated last calibr	84 h2	When was the tool last undated?	4
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90 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to Not Applicable 91 If appropriate, provide any additional information/context to the answers in this section. Not Applicable 9. PAYMENT TRANSPARENCY 92 Does the Entity adhere to the Wolfsberg Group Payment Yes	90		Voc
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9. PAYMENT TRANSPARENCY 92 Does the Entity adhere to the Wolfsberg Group Payment Yes		and and any and appropriate to	Not Applicable
9. PAYMENT TRANSPARENCY 92 Does the Entity adhere to the Wolfsberg Group Payment Yes			
9. PAYMENT TRANSPARENCY 92 Does the Entity adhere to the Wolfsberg Group Payment Yes	91		
9. PAYMENT TRANSPARENCY 92 Does the Entity adhere to the Wolfsberg Group Payment Yes		to the answers in this section.	Not Applicable
92 Does the Entity adhere to the Wolfsberg Group Payment Vas			
92 Does the Entity adhere to the Wolfsberg Group Payment Vas	9 PAYME	I NT TRANSPARENCY	
Transparency Standards?			Voc
		Transparency Standards?	1185

	In a real control of	
93	Does the Entity have policies, procedures and processes	
	to comply with and have controls in place to ensure	
00 -	compliance with: FATF Recommendation 16	Ven
93 a	Local Regulations	Yes
93 b		Yes
93 b1	If Y, specify the regulation	Brazil: BCB: Law 9.613, Law 13.810, Law 13.260, Circular 3.978, Circular Letter 4001 and Resolution 150. Cayman Island: Proceeds of Crime Act, Anti-Money Laundering Regulations, Proliferation Financing (Prohibition) Act and Terrorism Act.
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section 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.	Not Applicable
97	If appropriate, provide any additional information/context to the answers in this section.	Not Applicable
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:	Doth
102 a1	Are internal system of vendor-sourced tools used?	Both
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Transactions Screnning Swift / 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	< 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	Yes
106	transactions are subject to sanctions screening? Select the Sanctions Lists used by the Entity in its	
106 a	sanctions screening processes: Consolidated United Nations Security Council	Ligad for corporing quaternors and hopeficial owners and for filtering transcational data
106 b	Sanctions List (UN) United States Department of the Treasury's Office of	Used for screening customers and beneficial owners and for filtering transactional data Used for screening customers and beneficial owners and for filtering transactional data
106 c	Foreign Assets Control (OFAC) Office of Financial Sanctions Implementation HMT	·
	(OFSI)	Used for screening customers and beneficial owners and for filtering transactional data

106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	
		Cayman Islands Monetary (CIMA), People's Republic of China - Ministry of Public Security and the Hong Kong Authority (HKMA).
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	No
	G7 member countries have enacted comprehensive	
	jurisdiction-based Sanctions?	
109	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	1.55
109 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	Not Applicable
		TWO Applicable
110	If appropriate, provide any additional information/context	
	to the answers in this section.	
		Not Applicable
11. TRAIN	IING & EDUCATION	
111	Does the Entity provide mandatory training, which	
	includes:	
111 a	Identification and reporting of transactions to	Yes
	government authorities	
111 b		
	Examples of different forms of money laundering,	Voc
	terrorist financing and sanctions violations relevant for	Yes
444.0	terrorist financing and sanctions violations relevant for the types of products and services offered	
111 c	terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering,	Yes Yes
	terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 c	terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering,	
	terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant	Yes
111 d	terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes Yes
111 d	terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture	Yes Yes Yes
111 d 111 e 111 f	terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud	Yes Yes Yes
111 d 111 e 111 f 112	terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to:	Yes Yes Yes Yes Yes
111 d 111 e 111 f 112 112 a	terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence	Yes Yes Yes Yes Yes Yes
111 d 111 e 111 f 112 112 a 112 b	terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence	Yes Yes Yes Yes Yes Yes Yes
111 d 111 e 111 f 112 112 a 112 b 112 c	terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence Third parties to which specific FCC activities have	Yes
111 d 111 e 111 f 112 112 a 112 b 112 c 112 d 112 e	terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced	Yes
111 d 111 e 111 f 112 112 a 112 b 112 c 112 d 112 e	terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants)	Yes
111 d 111 e 111 f 112 112 a 112 b 112 c 112 d 112 e	terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training	Yes
111 d 111 e 111 f 112 112 a 112 b 112 c 112 d 112 e	terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high	Yes
111 d 111 e 111 f 112 112 a 112 b 112 c 112 d 112 e	terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training	Yes
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111 d 111 e 111 f 112 112 a 112 b 112 c 112 d 112 e	terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
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128 Does the Entity have a dedicated team responsible for Ves			Yes
	128	Does the Entity have a dedicated team responsible for	Yes
			·

129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
132	If appropriate, provide any additional information/context to the answers in this section.	Not Applicable

Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)
Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)

BANK OF CHINA (BRASIL) BANCO MULTIPLO S/A and CAYMAN BRANCH, is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

l, Deming Li, (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

l, Roberto Jose Carvalho dos Santos, (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

 (Signature & Date)
 (Signature & Date)