the Wolfsberg Group

Financial Institution Name: Location (Country) :

THE FEDERAL BANK LIMITED INDIA

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

No#	Question TY & OWNERSHIP	Answer
1	Full Legal Name	THE FEDERAL BANK LTD
2	Append a list of foreign branches which are covered by this questionnaire	Bank does not have any foreign branch
3	Editor (D.) and D.)	
J	Full Legal (Registered) Address	Federal Towers, P.B. No. 103, Aluva, Kerala, India-683101
4	Full Primary Business Address (if different from above)	Federal Towers,P.B.No.103,Aluva,Kerala,India-683101
5	Date of Entity incorporation/establishment	23-04-1931
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	BSE-FEDERALBNK NSE-FEDERALBNK LSE-FEDS
6 b	Member Owned/Mutual	No 🔻
6 c	Government or State Owned by 25% or more	No 🔻
6 d	Privately Owned	No 🔻
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	Not Applicable
7	% of the Entity's total shares composed of bearer shares	Not Applicable
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	Yes
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	IFSC BANKING UNIT/GIFT CITY Unit No 703, 7th Floor, Hiranandani Signature, GIFT City, Gandhinagar, Gujarat, India, 382355
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No v
10	Name of primary financial regulator/supervisory authority	Reserve Bank of India (RBI)
11	Provide Legal Entity Identifier (LEI) if available	335800J8VWGE2HGWF417
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	Not Applicable



	Jurisdiction of licensing authority and regulator of ultimate parent	India
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b		
	Private Banking	No S
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes C
14 e	Investment Banking	No C
14 f	Financial Markets Trading	No No No No
14 g	Securities Services/Custody	No C
14 h	Broker/Dealer	No S
141	Multilateral Development Bank	No C
14 j 14 k	Wealth Management Other (please explain)	No E
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	No
	customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	No
15 a	If Y, provide the top five countries where the non- resident customers are located.	Not Applicable
16	Select the closest value:	
16 a	Number of employees	10001+
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
18	If appropriate, provide any additional information/context to the answers in this section.	
2. PROD	UCTS & SERVICES	
2. PROD 19	UCTS & SERVICES Does the Entity offer the following products and services:	
19	Does the Entity offer the following products and services:	Yes
19 19 a	Does the Entity offer the following products and services: Correspondent Banking	Yes
128 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking	Yes Yes
19 19 a 19 a1	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	
19 a 19 a 19 a1 19 a1a	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks?	Yes
19 a 19 a 19 a1 19 a1a	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with	Yes
19 a 19 a 19 a1 19 a1a 19 a1b	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking	Yes Yes Yes
19 a 19 a 19 a1 19 a1a 19 a1a 19 a1b 19 a1c	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships	Yes Yes Yes Yes
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c	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 loreign banks?	Yes Tyes Tyes No Tyes Tyes Tyes Tyes Tyes Tyes Tyes Tyes
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c	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	Yes
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	Yes
19 a 19 a 19 a 19 a 19 a 19 a 19 a 10 a 10 a 10 a 10 a 10 a 10 a 10 a 10	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	Yes

The Wolfsberg Group 2023

CRAI BAAR

WITH MONTORING

DEPT.

ALUVE

19 at Does the Entity have processes and procedures in place to identify downstream relationships with MSBs ANTASPSP3** No	19 a1i		
19 c Cross-Border Remittences Ves		in place to identify downstream relationships with	Yes
99 c Cross-Sorder Remittences	19 b	Cross-Border Bulk Cash Delivery	No.
19 d Domestic Bulk Cash Delivery No 19 e Hold Mail No 19 hold			
19 e Hold Meil high principal Caph Letter No home page 19 p. 1 home page 19 p. 19 home page 19 p. 29 home page 29			No.
19 f International Cash Letter No 19 g Lory Price Securities No 19 h Payabile Through Accounts No 19 h Payabile Through Accounts No 19 l Payment services to non-bank entities who may then offer third party payment services to their Customers? 19 l If 'y please select all that apply below? 19 l Third Party Payment Service Providers (VASPa) No 19 l Third Party Payment Service Providers (VASPa) No 19 l Commerce Platforms No 19 l Commerce Platforms No 19 l Private Banking No 19 k Remois Daposet Capture (RDC) No 19 l Sponsoning Private ATMs No 19 n Trade Finance Yes No 19 n Trade Finance Yes No 19 n Trade Finance Yes 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 No 19 p The Cack cashing service No 19			
19 g Low Price Scourties No Payable Through Accounts No Payable Through Accounts No Payable Through Accounts No No Payable Through Accounts No			NO L
Paymet services to non-bank entities who may then other third party payment services to their Customers? No			NO L
Psyment services to non-bank entities who may hen offer third party payment services to their customers? 19 II **If Y**, please select all that apply below? 19 II **If Y**, please select all that apply below? 19 II **Ormerce Platforms No Other - Please explain No No Other - Please explain No No No Other - Please explain No No No No No Other - Please explain No No No No No No No No No N			No L
then offer third party payment services to their customers? 19 11 If Y, please select all that apply below? 19 12 Third Party Payment Service Providers No 19 13 Virtual Asset Service Providers No 19 14 Commerce Platforms No 19 15 Other - Please explain 19 15 Other - Please explain 19 16 Remote Deposit Capture (RDC) No 19 18 Sponsoring Private ATMs No 19 19 Sponsoring Private ATMs No 19 19 Sponsoring Private ATMs No 19 10 Sponsoring Private ATMs No 19 10 Sponsoring Private ATMs No 19 10 Virtual Assets 19 11 Check cashing service No 19 11 Sponsoring Private ATMs No 19 11 Check cashing service No 19 12 Virtual Assets 19 15 Check cashing service No 19 15 Sponsoring Private ATMs No 19 15 Check cashing service No 19 19 Sale of Monetary Instruments No 19 19 Check cashing the level of due diligence 19 19 Check cashing services to walk-in customers private more detail here, Including describing the level of due diligence. 19 10 Check cashing the No 10 Check cashing			No L
19 IZ Third Party Payment Service Providers 19 IX Virtual Assel Service Providers 19 IX Other - Please explain 19 II Other - Please explain 19 II Private Banking 19 IX Remote Deposit Capture (RDC) No	19 i	then offer third party payment services to their	No
19 IZ 19 IZ 19 IZ 19 IX 10 Virtual Asset Service Providers (VASPs) 19 IX 10 IX	19 1	If Y, please select all that apply below?	
19 IS	19 i2		No E
19 J Cither - Please explain 19 J Private Banking No Other - Please explain 19 J Ramote Deposit Capture (RDC) No 19 L Sonsoring Private ATMS No 19 m Stored Value Instruments No 19 m Tarde Finance Yes 19 o Virtual Assets No For each of the following please state whether you offer the service to walk-in-customers and if so, the applicable level of due diligence: 19 p1 Check cashing service 19 p1 Ghack cashing service 19 p2 Wire transfers 19 p2a If yes, state the applicable level of due diligence 19 p3 a Foreign currency conversion 19 p3 a If yes, state the applicable level of due diligence 19 p4 Sale of Monetary Instruments 19 p4 Sale of Monetary Instruments 19 p4 If yes, state the applicable level of due diligence 19 p5 If yes, state the applicable level of due diligence 19 p6 Sale of Monetary Instruments 19 p4 Sale of Monetary Instruments 19 p4 If yes, state the applicable level of due diligence 19 p6 Fyou offer other services to walk-in customers 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 21 If appropriate, provide any additional information/context to the answers in this section. 22 Oos the Entity (please specify) 23 AML, CTF & SANCTIONS PROGRAMME 24 Oos the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components of the following components of the sollowing components	19 i3	Virtual Asset Service Providers (VASPs)	No
Other - Please explain Other - Please explain Other - Please explain No Please explain No Remote Deposit Capture (RDC) No Sponsoring Private ATMS No Trade Finance Yes No Trade Finance Yes No 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: Yes Play A Seets Play A Seets Play A Write transfers Play A Write transfers Play A Seet the applicable level of due diligence Please select Yes Yes No No No Ro Ro Ro Ro Ro Ro Ro	19 i4		
19 k Remote Deposit Capture (RDC) No 19 I 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 19 p1a If yes, state the applicable level of due diligence 19 p2 Wire transfers Yes 19 p2a If yes, state the applicable level of due diligence 19 p3a Foreign currency conversion Yes 19 p3a If yes, state the applicable level of due diligence 19 p4 Sale of Monetary Instruments No 19 p4 Syes and the applicable level of due diligence 19 p5 If you offer other services to walk-in customers please select 19 p6 Please select 19 p7 Please select 19 p6 Please select 19 p7 Please select 19 p7 Please select 19 p7 Please select 19 p8 Please select 19 p8 Please select 19 p8 Please select 19 p9 Please provide more detail here, including describing the level of due diligence. 19 p8 Other high-risk products and services identified by the Entity (please specify) 19 q Other high-risk products and services identified by the Entity (please specify) 19 q If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 19 q If appropriate, provide any additional information/context to the answers in this section. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 21 ff appropriate, provide any additional information/context to the answers in this section. 22 Oos the Entity have a programme that sets minimum AMM, CTF and Sanctions standards regarding the following components: 22 Appointed Officer with sufficient 22 Appointed Officer with sufficient 22 Adverse information Screening 22 Beneficial Ownership 24 Adverse information Screening 25 Beneficial Ownership 26 Beneficial Ownership	19 15		
19 k Remote Deposit Capture (RDC) No 19 I 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 19 p1a If yes, state the applicable level of due diligence 19 p2 Wire transfers Yes 19 p2a If yes, state the applicable level of due diligence 19 p3a Foreign currency conversion Yes 19 p3a If yes, state the applicable level of due diligence 19 p4 Sale of Monetary Instruments No 19 p4 Syes and the applicable level of due diligence 19 p5 If you offer other services to walk-in customers please select 19 p6 Please select 19 p7 Please select 19 p6 Please select 19 p7 Please select 19 p7 Please select 19 p7 Please select 19 p8 Please select 19 p8 Please select 19 p8 Please select 19 p9 Please provide more detail here, including describing the level of due diligence. 19 p8 Other high-risk products and services identified by the Entity (please specify) 19 q Other high-risk products and services identified by the Entity (please specify) 19 q If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 19 q If appropriate, provide any additional information/context to the answers in this section. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 21 ff appropriate, provide any additional information/context to the answers in this section. 22 Oos the Entity have a programme that sets minimum AMM, CTF and Sanctions standards regarding the following components: 22 Appointed Officer with sufficient 22 Appointed Officer with sufficient 22 Adverse information Screening 22 Beneficial Ownership 24 Adverse information Screening 25 Beneficial Ownership 26 Beneficial Ownership	19 j	Private Banking	No C
19 I 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 19 p2 Wire transfers 19 p2 Wire transfers 19 p3 Foreign currency conversion 19 p3 Foreign currency conversion 19 p4 Sale of Monetary Instruments 19 p4 Sale of Monetary Instruments 19 p5 If yes, state the applicable level of due diligence 19 p6 If yes, state the applicable level of due diligence 19 p7 No 19 p4 Sale of Monetary Instruments 19 p6 If yes, state the applicable level of due diligence 19 p7 No 19 p6 If yes, state the applicable level of due diligence 19 p7 No 19 p6 If yes, state the applicable level of due diligence 19 p7 No 19 p6 If yes, state the applicable level of due diligence 19 p7 No 19 p7 No 19 p8 No 19			No E
19 m Slored 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 19 p2 Wire transfers 19 p2 Wire transfers 19 p2 If yes, state the applicable level of due diligence (and the service) 19 p3 Foreign currency conversion 19 p3 Foreign currency conversion 19 p4 Sale of Monetary Instruments 19 p4 Sale of Monetary Instruments 19 p4 If yes, state the applicable level of due diligence (and the service) 19 p5 If yes state the applicable level of due diligence (and the service) 19 p6 If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference's relate to and the branch'es that this applies to. 21 If appropriate, provide any additional information/context to the answers in this section. 22 Oces the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 Appointed Officer with sufficient. 23 Appointed Officer with sufficient. 24 Appointed Officer with sufficient. 25 Beneficial Ownership 26 Beneficial Ownership 27 Yes 28 Beneficial Ownership 28 Appointed Officer with sufficient. 29 Beneficial Ownership 29 Yes			
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 Yes 19 p2a If yes, state the applicable level of due diligence If yes, state the applicable level of due diligence If yes, state the applicable level of due diligence If yes, state the applicable level of due diligence If yes, state the applicable level of due diligence If yes, state the applicable level of due diligence If yes, state the applicable level of due diligence If yes, state the applicable level of due diligence If yes, state the applicable level of due diligence If yes offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. 19 p4 Other high-risk products and services identified by the Entity (please specify) 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 21 If appropriate, provide any additional information/context to the answers in this section. 22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 Appointed Officer with sufficient Yes 22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 Beneficial Ownership Yes 22 C Beneficial Ownership 7es			No.
19 o Virtual Assets 19 p For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence: 19 p1 Check cashing service 19 p1 If yes, state the applicable level of due diligence 19 p2 Wire transfers 19 p2 Wire transfers 19 p3 Foreign currency conversion 19 p3 Foreign currency conversion 19 p4 Sale of Monetry Instruments 19 p4 Sale of Monetr services to walk-in customers please select 19 p5 If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. 19 q Other high-risk products and services identified by the Entity (please specify) 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference's relate to and the branchies that this applies to. 21 If appropriate, provide any additional information/context to the answers in this section. 22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 Appointed Officer with sufficient 22 Appointed Officer with sufficient 22 Appointed Officer with sufficient 23 Adverse information Screening 24 Senetical Ownership 26 Senetical Ownership 27 Senetical Ownership 28 Ownership 29 Adverse information Screening 29 Yes 20 Senetical Ownership 20 Reference of the Entity of the Screening 20 Senetical Ownership 21 Senetical Ownership 22 Senetical Ownership 24 Owerse information Screening 25 Senetical Ownership			
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			
offer the service to walk-in customers and if so, the applicable level of due diligence: 19 p1	2.12.20		NO L
19 p1a If yes, state the applicable level of due diligence 19 p2 Wire transfers 19 p2a If yes, state the applicable level of due diligence 19 p3 Foreign currency conversion 19 p3 Foreign currency conversion 19 p3 If yes, state the applicable level of due diligence 19 p4 Sale of Monetary Instruments No 19 p4a If yes, state the applicable 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. 19 p5 Other high-risk products and services identified by the Entity (please specify) 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 21 If appropriate, provide any additional information/context to the answers in this section. 22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 Appointed Officer with sufficient Yes 22 Adverse Information Screening Yes 22 Adverse Information Screening Yes 22 Beneficial Ownership	19 р	offer the service to walk-in customers and if so, the	
19 p1a If yes, state the applicable level of due diligence 19 p2 Wire transfers 19 p3 If yes, state the applicable level of due diligence 19 p3 Foreign currency conversion 19 p3 Foreign currency conversion 19 p4 Sale of Monetary Instruments No 19 p4a If yes, state the applicable 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. 19 p5 Other high-risk products and services identified by the Entity (please specify) 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branchies that this applies to. 21 If appropriate, provide any additional information/context to the answers in this section. 22 Does the Entity have a programme that sets minimum AML, CTF & SANCTIONS PROGRAMME 22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 Appointed Officer with sufficient 22 Appointed Officer with sufficient 22 Adverse Information Screening Yes 22 Beneficial Ownership Yes	19 p1	Check cashing service	No C
19 p2 Wire transfers 19 p2a If yes, state the applicable level of due diligence 19 p3 Foreign currency conversion 19 p3a If yes, state the applicable level of due diligence 19 p4 Sale of Monetary Instruments 19 p4 Sale of Monetary Instruments 19 p5 If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. 19 p6 Other high-risk products and services identified by the Entity (please specify) 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 21 If appropriate, provide any additional information/context to the answers in this section. 22 Does the Entity have a programme that sets minimum AML, CTF & SANCTIONS PROGRAMME 22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 a Appointed Officer with sufficient Yes 22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes			Please select Yes Identification and verification Yes Identification and verification Light Selection Light S
19 p2a If yes, state the applicable level of due diligence 19 p3 Foreign currency conversion 19 p4 Sale of Monetary Instruments 19 p4 Sale of Monetary Instruments 19 p4 If yes, state the applicable 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. 19 q Other high-risk products and services identified by the Entity (please specify) 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 21 If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 21 If appropriate, provide any additional information/context to the answers in this section. 22 Does the Entity have a programme that sets minimum AML, CTF & SANCTIONS PROGRAMME 22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 a Appointed Officer with sufficient 22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes			Yes
19 p3 Foreign currency conversion Yes 19 p3a If yes, state the applicable level of due diligence Sale of Monetary Instruments No 19 p4a If yes, state the applicable level of due diligence 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. 19 q Other high-risk products and services identified by the Entity (please specify) 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch'es that this applies to. 21 If appropriate, provide any additional information/context to the answers in this section. 21 If appropriate, provide any additional information/context to the answers in this section. 22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 a Appointed Officer with sufficient Yes 22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes			Identification and verification
19 p3a			Yes
19 p4 Sale of Monetary Instruments No 19 p4a If yes, state the applicable 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. 19 q Other high-risk products and services identified by the Entity (please specify) 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 21 If appropriate, provide any additional information/context to the answers in this section. 3. AML, CTF & SANCTIONS PROGRAMME 22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 a Appointed Officer with sufficient Yes 22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes			Identification and verification
19 p4a If yes, state the applicable 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. 19 q Other high-risk products and services identified by the Entity (please specify) 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 21 If appropriate, provide any additional information/context to the answers in this section. 3. AML, CTF & SANCTIONS PROGRAMME 22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 a Appointed Officer with sufficient Yes 22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes			No
If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. 19 q Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. 3. AML, CTF & SANCTIONS PROGRAMME 20 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Appointed Officer with sufficient Yes 22 A Appointed Officer with sufficient Yes 23 Adverse Information Screening Yes 24 Beneficial Ownership Yes			Please select
the Entity (please specify) 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 21 If appropriate, provide any additional information/context to the answers in this section. 3. AML, CTF & SANCTIONS PROGRAMME 22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 Appointed Officer with sufficient Yes 22 Adverse Information Screening Yes 22 Beneficial Ownership Yes		please provide more detail here, including	Not applicable
Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. 3. AML, CTF & SANCTIONS PROGRAMME 20 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 21 Appointed Officer with sufficient Yes 22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes			
and the branch/es that this applies to. 21 If appropriate, provide any additional information/context to the answers in this section. 3. AML, CTF & SANCTIONS PROGRAMME 22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 Appointed Officer with sufficient Yes 22 Adverse Information Screening Yes 22 Beneficial Ownership Yes	19 q		No
information/context to the answers in this section. 3. AML, CTF & SANCTIONS PROGRAMME 22 Does the Enity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 Appointed Officer with sufficient 22 Adverse Information Screening 22 Beneficial Ownership Yes	·	the Entity (please specify) Confirm that all responses provided in the above	
22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 a Appointed Officer with sufficient Yes 22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes	20	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	
22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 a Appointed Officer with sufficient Yes 22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes	20 20 a	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.	
AML, CTF and Sanctions standards regarding the following components: 22 a Appointed Officer with sufficient Yes 22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes	20 a	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.	
22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes	20 a 21 3. AML, (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.	
22 c Beneficial Ownership Yes	20 a 21 3. AML, C 22	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. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	Yes
	20 a 21 3. AML, C	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. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient	Yes
	20 a 21 3. AML, C	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. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening	Yes
22 d Cash Reporting Yes	20 a 21 3. AML, C 22 22 a 22 b	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. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening	Yes
	20 a 21 3. AML, C 22 a 22 b 22 c	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. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening	Yes
	20 a 21 3. AML, (22 22 a 22 b 22 c 22 d	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. ETF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting	Yes
	20 a 21 a 21 a 22 a 22 b 22 c 22 c 22 d 22 e	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. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD	Yes
	20 a 21 3. AML, C 22 2 2 2 2 2 2 2 2 2 2 2 2 5 2 2 5 2 2 5 2 2 5 2 5 2 5 5 2 5 6 2 2	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. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	Yes
99 II 1 4 II 4 II 4 II 4 II 4 II 4 II 4	20 a 21 a 21 a 22 a 22 b 22 c 22 d 22 c 22 d 22 c 22 d 22 c 22 d 22 c	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. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Yes
221 Policies and Procedures Ves	20 a 21 a 21 a 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	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. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Yes
22 l Policies and Procedures Yes	20 a 21 a 21 a 3. AML, C 22 a 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i	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. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes
22 J PEP Screening Yes	20 a 21 a 21 a 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 i 22 j	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. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Yes
	a AML, C a b c d f	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. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Yes
22 Policies and Procedures Yes	200 a 201 21 22 a 22 b 22 c 22 d 22 c 22 d 22 e 22 d 22 e 22 f 22 g 22 h	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. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Yes
	20 a 21 a 21 a 3. AML, C 22 a 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i	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. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes
	20 a 21 a 21 a 22 a 22 b 22 c 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 i 22 j	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. CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Yes Yes Yes Yes Yes Yes Yes Yes



22 m	Suspicious Activity Reporting	Yes	
22 n	Training and Education	Yes	무
22 o	Transaction Monitoring	Yes	늗
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	11-100	
24	is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Yes	•
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes	•
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No	_
26 a	If Y, provide further details		
27	Does the entity have a whistleblower policy?	Yes	
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	•
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
29	If appropriate, provide any additional information/context to the answers in this section.		
4. ANTI	BRIBERY & CORRUPTION		
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes	-
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes	•
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes	•
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes	•
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity	
35	Does the Entity have a global ABC policy that:		
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes	•
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes	•
35 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes	•
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes	₹
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes	•
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes	F
38 a	If N, provide the date when the last ABC EWRA was completed.		
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes	•
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes	•
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes	•



40 b			
	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes	-
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes	-
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes	•
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes	V
41	Does the Entity's Internal audit function or other independent third party cover ABC Policies and Procedures?	Yes	•
42	Does the Entity provide mandatory ABC training to:		4-44
42 a	Board and senior Committee Management	Yes	
42 b	1st Line of Defence	Yes	-
42 c	2nd Line of Defence	Yes	mein
42 d	3rd Line of Defence	Yes	
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Yes	•
42 f	Non-employed workers as appropriate (contractors/consultants)	Yes	•
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes	•
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	•
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
45	If appropriate, provide any additional information/context to the answers in this section.		
5. AML, 46	CTF & SANCTIONS POLICIES & PROCEDURES Has the Entity documented policies and 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 46 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering	Yes	
46 a 46 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing		
46 46 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering	Yes Yes	
46 a 46 b 46 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at	Yes Yes Yes	
46 a 46 b 46 c 47	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards	Yes Yes Yes	
46 a 46 b 46 c 47	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against:	Yes Yes Yes Yes Yes Yes Yes	
46 a 46 b 46 c 47 48	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards	Yes Yes Yes Yes Yes	
46 a 46 b 46 c 47 48 a 48 a 48 a 1	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes Yes Yes Yes Yes	
46 a 46 a 46 b 46 c 47 48 48 a 48 a1 48 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that:	Yes Yes Yes Yes Yes Yes Yes Yes Yes	
46 a 46 a 46 b 46 c 47 48 48 a 48 a1 48 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes Yes Yes Yes Yes Yes Yes Yes Yes	
46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b 49	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes	
46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes	
46 a 46 a 46 b 46 c 47 48 48 a 48 a1 48 b1 49 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks	Yes	
46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 a 49 a 49 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks	Yes	
46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 b 49 b 49 c 49 d	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with other entities that provides services to shell banks Prohibit topening and keeping of accounts for Section 311 designated entities	Yes	
46 a 46 a 46 b 46 c 47 48 48 a 48 a 48 a 49 b 49 c 49 d 49 e	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for unlicensed banks	Yes	



C800Q V1.4

55 b 55 c 55 d 55 5 d 55 5 d 6 6 a b c d d	Tr. Na Ne Tra Goo Ma Has in the If N EW Does risk α Clie Proc Cha Geog Does effectiv Cust	ws uning and Education vernance nagement Information the Entity's AML & CTF EWRA been completed last 12 months? provide the date when the last AML & CTF RA was completed. the Entity's Sanctions EWRA cover the inherent imponents detailed below: nt uct	Yes
55 b 55 c 55 d 55 e 55 f 6 6 a 7 7 a b c d d	Tr. Na Ne Tra Goo Ma Has in the If N EW Does risk α Clie Proc Cha Geog Does effectiv Cust	ws uning and Education vernance nagement Information the Entity's AML & CTF EWRA been completed last 12 months? provide the date when the last AML & CTF RA was completed. the Entity's Sanctions EWRA cover the inherent imponents detailed below: at the Entity's Sanctions EWRA cover the controls represent the Entity's Sanctions EWRA cover the Entity's EWRA cover the Entity Sanctions	Yes
55 b 55 c 555 d 555 e 555 f 55 g 55 h 66 a 7 7 a 7 a 7 a 7 a 7 a 7 a 7 a 7 a	Tr. Na Ne Tra Goo Ma Has in the If N EW Does risk of Cile Proc Cha Geo Does effectiv Cust	ws uning and Education vernance nagement Information the Entity's AML & CTF EWRA been completed last 12 months? provide the date when the last AML & CTF RA was completed. the Entity's Sanctions EWRA cover the inherent imponents detailed below: int ucct innel graphy the Entity's Sanctions EWRA cover the controls the Entity's Extending the Entity's Sanctions EWRA cover the controls the Entity's Extending the Entity's Extending the Entity's Extending the Entity Extending the	Yes
55 b 55 c 55 d 55 e 655 f 65 g 65 h 66 a 77 a 7 a 7 a 7 d 7 d 7 d 7 d 7 d 7 d	Tr. Na Ne Tra Goo Ma Has in the If N EW Does risk of Cile Proc Cha Geo Does effective	ws Inning and Education vernance nagement Information the Entity's AML & CTF EWRA been completed last 12 months? provide the date when the last AML & CTF RA was completed. the Entity's Sanctions EWRA cover the inherent emponents detailed below: Int luct intel graphy the Entity's Sanctions EWRA cover the controls were served and th	Yes
55 b 55 c 55 d 655 e 66 a 7 7 a 7 d 7 d	Tr. Ne Ne Tra Go Ma Has in the If N EW Does risk of Clie Proc Cha Geo Does risk	ws suring and Education vernance magement Information the Entity's AML & CTF EWRA been completed last 12 months? provide the date when the last AML & CTF RA was completed. the Entity's Sanctions EWRA cover the inherent emptonents detailed below: the tent of the control of the entity's Sanctions EWRA cover the inherent emptonents detailed below: the tent of the control of the entity's Sanctions EWRA cover the controls the entity's Sanctions EWRA cover the controls	Yes Yes Yes Yes Yes Yes Yes Yes Yes
55 b 55 c 55 d 655 e 66 a 7 7 a 7 d 7 d	Tr. Ne. Ne. Tra. Go. Ma Has in the If N EW Does risk of Citie Proc Cha Geo.	ws suring and Education vernance nagement Information the Entity's AML & CTF EWRA been completed last 12 months? provide the date when the last AML & CTF RA was completed. the Entity's Sanctions EWRA cover the inherent omponents detailed below: the third that the cover the inherent omponents detailed below:	Yes Yes Yes Yes Yes Yes Yes Yes Yes
55 b 55 c 55 d 55 e 55 f 65 g 66 a 77	Tr. Na Ne Tra Go Ma Has in the If N EW Does risk or Clie Proc	ws uning and Education vernance nagement Information the Entity's AML & CTF EWRA been completed last 12 months? provide the date when the last AML & CTF RA was completed. the Entity's Sanctions EWRA cover the inherent imponents detailed below: int uct intel	Yes Yes Yes Yes Yes Yes Yes Yes Yes
55 b 55 c 55 d 55 e 55 f 65 g 66 a	Tr. Na Ne Tra Goo Ma Has in the If N EW	ws uning and Education vernance nagement Information the Entity's AML & CTF EWRA been completed last 12 months? provide the date when the last AML & CTF RA was completed. the Entity's Sanctions EWRA cover the inherent imponents detailed below: nt uct	Yes Yes Yes Yes Yes Yes Yes
55 b 55 c 55 d 55 e 55 f 65 g 66 a	Tr. Na Ne Tra Goo Ma Has in the If N EW	ws Inning and Education vernance nagement Information the Entity's AML & CTF EWRA been completed last 12 months? provide the date when the last AML & CTF RA was completed. the Entity's Sanctions EWRA cover the inherent imponents detailed below:	Yes Yes Yes Yes Yes
55 b 55 c 55 d 555 e 55 f 65 g 55 h 6	Tr. Na Ne Tra Go Ma Has in the ff N EW	ws sining and Education vernance nagement Information the Entity's AML & CTF EWRA been completed last 12 months? provide the date when the last AML & CTF RA was completed. the Entity's Sanctions EWRA cover the inherent imponents detailed below:	Yes Yes Yes Yes
55 b 55 c 55 d 55 e 55 f 55 g 55 h 6	Tr. Na Ne Tre Go Ma Has in the	ws sining and Education vernance nagement information the Entity's AML & CTF EWRA been completed that 12 months? provide the date when the last AML & CTF RA was completed.	Yes Yes Yes Yes
55 b 55 c 55 d 55 e 55 f 55 g 55 h	Tr. Na Na Na Tra Go Ma Has in the	ws inining and Education vernance nagement Information the Entity's AML & CTF EWRA been completed last 12 months? provide the date when the last AML & CTF	Yes Yes Yes
55 b 55 c 55 d 55 e 55 f 55 g 5 h	Tr. Na Ne Tra Go Ma Has in the	ws Ining and Education vernance nagement Information the Entity's AML & CTF EWRA been completed I last 12 months?	Yes Yes Yes
55 b 55 c 55 d 55 e 55 f 55 g 55 h	Tr. Na Ne Tra Go Ma Has	ws uning and Education vernance nagement Information the Entity's AML & CTF EWRA been completed	Yes Yes Yes
55 b 55 c 55 d 55 e 55 f 55 g 5 h	Tr. Na Ne Tra Go	ws uning and Education vernance nagement information	Yes Yes
55 b 55 c 55 d 55 e 55 f 5 g	Tr. Na Ne Tra	ws nining and Education	Yes
55 b 55 c 55 d 55 e	Tr Na Ne	ws	
55 b 55 c 55 d	Tr.		Yes
55 b 55 c 55 d	Tr		
55 b 55 c		me Screening against Adverse Media/Negative	1.00
55 b		ansaction Screening	Yes
_		P Identification	Yes
JJ 4		ustomer Due Diligence	Yes
55 a		ansaction Monitoring	Yes
	cor	trols effectiveness components detailed below:	
55		es the Entity's AML & CTF EWRA cover the	100
54 c		eography	Yes
54 0	c C	hannel	Yes
54		roduct	Yes Yes
54 :		Client	Va
6. A	D	SANCTIONS RISK ASSESSMENT Des the Entity's AML & CTF EWRA cover the nerent risk components detailed below:	
53	Îr	appropriate, provide any additional formation/context to the answers in this section.	
E7		and the branch/es that this applies to.	
5:	2 a	If N, clarify which questions the difference to select	yes e to
5	52	Confirm that all responses provided in the above	5 years or more
	51 a	If Y, what is the retention period?	
L		Does the Entity have record retention procedures t comply with applicable laws?	that Yes
-	51	around their business?	Yes
	50	Has the Entity defined a risk tolerance statement similar document which defines a risk boundary	or
	49 n	Outline the processes for the maintenance of internal "watchlists"	Yes
	49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative I	Naws Yes
		handle customers that were previously exited financial crime reasons if they seek to re-estable relationship	
	491	Define the process for exiting clients for financ crime reasons that applies across the entity, including foreign branches and affiliates Define the process and controls to identify and	Yes
	49 k	Define the process, where appropriate, for terminating existing customer relationships du financial crime risk	
	49)	issues/potentially suspicious activity identified employees	



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 \	7
59 a	If N, provide the date when the last Sanctions EWRA was completed.	lun	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	7
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	<u></u>	
61	If appropriate, provide any additional information/context to the answers in this section.		
	CDD and EDD		
62	Does the Entity verify the identity of the customer?	Yes	
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes	•
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:		
64 a	Customer identification	Yes	
64 b	Expected activity	Yes	-
64 c	Nature of business/employment	Yes	
64 d	Ownership structure	Yes	V
64 e	Product usage	Yes	otes d
64 f	Purpose and nature of relationship	Yes	7
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	. 800
65 a1	Are ultimate beneficial owners verified?		▼.
65 b	Authorised signatories (where applicable)		Y
65 c	Key controllers	Yes	u est
65 d 66	Other relevant parties What is the Entity's minimum (lowest) threshold	Yes	Ţ
67	applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification?	Yes T	•
67 a	If Y, what factors/criteria are used to determine the		
07.4	customer's risk classification? Select all that apply:		15
67 a1	Product Usage	Yes C	
67 a2	Geography Business Type/Industry	Yes L	
67 a4	Legal Entity type	Yes	
67 a5	Adverse Information		¥
67 a6	Other (specify)	Transaction Volume, Customer Type, PEP status etc.	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	No	•
68 a	If Y, is this at:		
68 a1	Onboarding		Y
68 a2	KYC renewal	No E	
68 a3	Trigger event	Yes	=
68 a4	Other	No	_
68 a4a	If yes, please specify "Other"		
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes	•
69 a	If Y, is this at:		_
69 a1	Onboarding	Yes	-
69 a2	KYC renewal		_



69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	
	Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
71 a	If Y, is this at:	L. L
71 a1	Onboarding	Yes
71 a2	KYC renewal	No C
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	No C
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	
74 a4	5 years or more	No C
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	High Risk Customers-2 years Medium Risk Customers- 8 years Low Risk Customers -10 years
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Do not have this category of customer or industry
76 b	Respondent Banks	Always subject to EDD
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	Always subject to EDD
76 d	Extractive industries	Prohibited
76 e	Gambling customers	
76 f	General Trading Companies	
76 g	Marijuana-related Entities	
76 h	MSB/MVTS customers	
761		
	Non-account customers	Restricted
76 j	Non-Government Organisations	Always subject to EDD
76 k	Non-resident customers	EDD on risk-based approach
761	Nuclear power	Prohibited
76 m	Payment Service Providers	Always subject to EDD
76 n	PEPs	Always subject to EDD
76 o	PEP Close Associates	Always subject to EDD
76 p	PEP Related	Abusus subject to EDD
76 q	Precious metals and stones	Always subject to EDD
76 r	Red light businesses/Adult entertainment	Prohibited [
76 s	Regulated charities	
76 t	Shell banks	Always subject to EDD
76 u		Prohibited C
	Travel and Tour Companies	Always subject to EDD
76 v		Prohibited
76 w	Used Car Dealers	Always subject to EDD
76 x 76 y	Virtual Asset Service Providers Other (specify)	Always subject to EDD
17	If restricted, provide details of the restriction	Limited transactions
78	Does EDD require senior business management and/ or compliance approval?	Yes



78 a	If V indicate who are ideath	I a	
79	If Y indicate who provides the approval:	Both	_
	Does the Entity have specific procedures for onboarding entities that handle client money such as	Yes	_
	lawyers, accountants, consultants, real estate agents?	105	
80	Does the Entity perform an additional control or		
	quality review on clients subject to EDD?	Yes	•
81	Confirm that all responses provided in the above		
	Section are representative of all the LE's branches	Yes	_
81 a	If N, clarify which questions the difference/s relate to		_
	and the branch/es that this applies to		
82	If appropriate, provide any additional		
	information/context to the answers in this section.		
		97 - 2	
	, and the second		
8. MONIT	ORING & REPORTING		
83	Does the Entity have risk based policies, procedures		=
	and monitoring processes for the identification and	Yes	٠l
	reporting of suspicious activity?	les .	
		L	_
84	What is the method used by the Entity to monitor	I	
	transactions for suspicious activities?	Automated	Ĭ
84 a	If manual or combination selected, specify what		_
07 4	type of transactions are monitored manually		
	iyes or sansassano are memeres mandany		
		8	
	If automated or combination selected, are internal		
84 b	system or vendor-sourced tools used?	Vendor-sourced tools	▼
84 b1	If "Vendor-sourced tool" or 'Both' selected, what is	Compass	
	the name of the vendor/tool?		
84 b2	When was the tool last updated?	< 1 year	₹
			=
84 b3	When was the automated Transaction Monitoring	< 1 year	+l
	application last calibrated?		
85	Does the Entity have regulatory requirements to	\	30
	report suspicious transactions?	Yes	1
85 a	If Y, does the Entity have policies, procedures and		97
	processes to comply with suspicious transaction	Yes	•
	reporting requirements?		
0.0	Door the Entity have policies procedures and		1207
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from	Yes	J
	the monitoring of customer transactions and activity?		6.
			-
87	Does the Entity have a data quality management	· · · · · · · · · · ·	800
	programme to ensure that complete data for all	Yes	-
	transactions are subject to monitoring?		
	Does the Entity have processes in place to respond		
88	to Request For Information (RFIs) from other entities	Yes	-1
	in a timely manner?	·	
	in a unitry manner:	,	
20	<u> </u>		=
89	Does the Entity have processes in place to send	Von	
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in	Yes	•
	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes	•
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above	Yes Yes	•
90	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches		•
	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? 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		•
90	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? Confirm that all responses provided in the above Section are representative of all the LE's branches		Y
90	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? 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		~
90 90 a	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? 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		•
90	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? 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		Y
90 90 a	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? 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		_
90 90 a	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? 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		•
90 a	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? 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.		
90 a 91 9. PAYME	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? 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.	Yes	N
90 a	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? 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.	Yes	*



93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:		_
93 a	FATF Recommendation 16	Yes	
93 b	Local Regulations	Yes	_
93 b1	If Y, specify the regulation	Master Direction - Know Your Customer (KYC) Direction, 2016 (Updated as on November 06, 2024) (https://www.rbl.org.in/Scripts/BS_ViewMasDirections.aspx?id=11566)	T
93 c	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	F
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	F
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		Ľ
97	If appropriate, provide any additional information/context to the answers in this section.		
10. SANC	CTIONS		3.7
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:		<u> </u>
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools	
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Firco Compliance link	
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	<1 year	•
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes	
104	What is the method used by the Entity?	Automated	<u></u>



105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes	•
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:		
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data	•
106 Ь	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data	•
106 с	Office of Financial Sanctions Implementation HMT (OFSI)	Not used	•
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data	
106 e 106 f	Lists maintained by other G7 member countries Other (specify)	Not used WMD,UAPA	
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:		
107 a	Customer Data	Same day to 2 business days	
107 b	Transactions	Same day to 2 business days	-
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No	•
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	₹
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
110	If appropriate, provide any additional information/context to the answers in this section.		
11. TRAIN 111	IING & EDUCATION Does the Entity provide mandatory training, which includes:		, alfa La
111 a	Identification and reporting of transactions to government authorities	Yes	S. N. DAL
111 Ь	Examples of different forms of money laundering,		-
	terrorist financing and sanctions violations relevant for the types of products and services offered	Yes	\ \ \
111 c		Yes	\ \ \
	for the types of products and services offered Internal policies for controlling money laundering,		▼ ▼ ▼
111 d	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 111 e	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 111 e 111 f	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	
111 d 111 e 111 f 112	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	
111 d 111 e 111 f 112 112 a 112 b	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	
111 d 111 e 111 f 112 112 a 112 b 112 c	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	
111 d 111 e 111 f 112 112 a 112 b 112 c 112 d	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	Yes Yes Yes Yes Yes Yes	
111 d 111 e 111 f 112 112 a 112 b 112 c 112 d 112 c	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 Yes	
111 d 111 e 111 f 112 112 a 112 b 112 c 112 d 112 c	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 Yes Yes Yes Yes Yes Yes Yes Yes	
111 d 111 e 111 f 112 112 a 112 b 112 c 112 d 112 c	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	Yes	
111 c 111 d 111 e 111 f 111 f 112 a 112 b 112 c 112 d 112 c 112 d 113	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 1112 112 b 112 c 112 d 112 c	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-risk products, services and activities? Does the Entity provide customised training for AML,	Yes	



115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
116	If appropriate, provide any additional information/context to the answers in this section.		
12 QUALITY	ASSURANCE /COMPLIANCE TESTING		
117	Does the Entity have a program wide risk based		_
,	Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes	
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yos	•
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	<u> </u>
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
120	If appropriate, provide any additional information/context to the answers in this section.		
13, AUDIT	Landing and the second second and the second		=
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes	*
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:		
122 a	Internal Audit Department	Yearly	Y
122 b	External Third Party	Component-based reviews	_
123	Does the internal audit function or other independent third party cover the following areas:		_
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures		_
123 b	Enterprise Wide Risk Assessment	Yes	
123 c	Governance	Yes	룩
123 d	KYC/CDD/EDD and underlying methodologies	Yes	5
123 e	Name Screening & List Management	Yes L	\equiv
123 f	Reporting/Metrics & Management Information	Yes	5
123 g	Suspicious Activity Filing	Yes	\equiv
123 h	Technology Transaction Monitoring		
123 i	Transaction Screening including for sanctions	Yes	Į.
123 J 123 k	Training & Education	Yes	
123 1	Other (specify)		_
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes	<u>-</u>
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes	<u>기</u>
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
126	If appropriate, provide any additional information/context to the answers in this section.		
14. FRAU	D and the second second		=
127	Does the Entity have policies in place addressing fraud risk?	Yes	깈
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes	



129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the enswers in this section.	

Declaration Statement

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

THE FEDERAL BANK LTD

(Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime taws, 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 internetional payments and has adopted/is committed to adopting these

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.

I MOHAMMED VASEEM SHEIKH (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers pron 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

2925 (Signature & Dale) JADE RORASON (MLRO or equivalent), certify that I have read and understood this declaration, that the answers correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial institution valent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and

(Signature & Date)