the Wolfsberg Group

Financial Institution Name: Location (Country) : Arab Jordan Investment Bank Jordan

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

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	Arab Jordan Investment Bank
2	Append a list of foreign branches which are covered by this questionnaire	Qatar Cyprus
3	Full Legal (Registered) Address	AJIB Tower-200 Zahran Street, Amman - Jordan.
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	02/02/1978
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	Amman Stock Exchange Symbol: AJIB
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	
7	% of the Entity's total shares composed of bearer shares	0
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Name of primary financial regulator/supervisory authority	Central Bank of Jordan
11	Provide Legal Entity Identifier (LEI) if available	5493001VF705O1BV0047
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	N/A

13	Jurisdiction of licensing authority and regulator of	N/A
	ultimate parent	0)(
14	Select the business areas applicable to the Entity	
		Yes
14 a	Retail Banking	
14 b	Private Banking	No
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	No
14 j	Wealth Management	Yes
14 k	Other (please explain)	
14 K	Other (please explain)	
15	Does the Entity have a significant (10% or more)	
	portfolio of non-resident customers or does it derive	
	more than 10% of its revenue from non-resident	
	customers? (Non-resident means customers primarily	No
	resident in a different jurisdiction to the location	
	where bank services are provided)	
15 a	If Y, provide the top five countries where the non-	
	resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	501-1000
2.40.00	Total Assets	Greater than \$500 million
16 b	Control Andrews (Account of the Control of the Cont	Greater than \$500 million
17	Confirm that all responses provided in the above	Yes
	Section are representative of all the LE's branches.	
17 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
1		
40	If a constitute provide any additional	
18	If appropriate, provide any additional information/context to the answers in this section.	
	information/context to the answers in this section.	
2. PRODI	UCTS & SERVICES	
19	Does the Entity offer the following products and	
	services:	
19 a	Correspondent Banking	Yes
19 a1	If Y	165
7 TO TO TO TO		
19 a1a	Does the Entity offer Correspondent Banking	No
	services to domestic banks?	SWY
19 a1b	Does the Entity allow domestic bank clients to	No
	provide downstream relationships?	No
19 a1c	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	Yes
	domestic banks?	100
40 1:		
19 a1d	Does the Entity offer Correspondent Banking	Yes
	services to foreign banks?	MATA
19 a1e	Does the Entity allow downstream relationships	No
	with foreign banks?	No
19 a1f	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	Yes
	foreign banks?	103
10 /		
19 a1g	Does the Entity offer Correspondent Banking	
	services to regulated Money Services Businesses	Yes
	(MSBs)/Money Value Transfer Services (MVTSs)?	
19 a1h	Does the Entity allow downstream relationships	
	with MSBs, MVTSs, or Payment Service Provider	
	(PSPs)?	
10 (11)	A Company of the Comp	
19 a1h1	MSBs	No
19 a1h2	MVTSs	No
		I No.
19 a1h3	PSPs	No

	Commence of the second	
19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	Yes
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
	Domestic Bulk Cash Delivery	Yes
19 d	The state of the s	
19 e	Hold Mail	No
19 f	International Cash Letter	No
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	No
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	Please select
19 i3	Virtual Asset Service Providers (VASPs)	Please select
19 i4	eCommerce Platforms	Please select
19 i5	Other - Please explain	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No
19 [Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 m	Trade Finance	Yes
19 n 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:	
10 -1		Yes
19 p1	Check cashing service	
19 p1a	If yes, state the applicable level of due diligence	Identification and verification
19 p2	Wire transfers	No .
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p3	Foreign currency conversion	Yes
19 p3a	If yes, state the applicable level of due diligence	Identification and verification
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	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.	Yes
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.	
	TF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	Yes
22 b	Adverse Information Screening	Yes
22 c	Beneficial Ownership	Yes
22 d	Cash Reporting	Yes
22 e	CDD	Yes
22 f	EDD	Yes
22 g	Independent Testing	Yes
22 g 22 h	Independent Testing Periodic Review	Yes Yes
22 g 22 h 22 i	Independent Testing Periodic Review Policies and Procedures	Yes Yes Yes
22 g 22 h	Independent Testing Periodic Review Policies and Procedures PEP Screening	Yes Yes
22 g 22 h 22 i	Independent Testing Periodic Review Policies and Procedures	Yes Yes Yes
22 g 22 h 22 i 22 j	Independent Testing Periodic Review Policies and Procedures PEP Screening	Yes Yes Yes Yes

22 m	Suspicious Activity Reporting	Yes
22 m 22 n	Training and Education	Yes
22 n 22 o	Transaction Monitoring	Yes
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:	Not Applicable
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 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes

40 b		
	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
42 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable
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.	
E ABAL C	CTF & SANCTIONS POLICIES & PROCEDURES	
5. AML, C	Has the Entity documented policies and procedures	
40	consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent, detect and report:	
46 a		Yes
46 a 46 b	detect and report:	Yes Yes
	detect and report: Money laundering	
46 b	detect and report: Money laundering Terrorist financing	Yes
46 b 46 c	detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at	Yes Yes
46 b 46 c 47 48	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
46 b 46 c 47 48 48 a 48 a1	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
46 b 46 c 47 48 48 a 48 a 48 a 48 b	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	Yes Yes Yes Yes Yes Yes Yes Yes
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46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b 49	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
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46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b 49 a	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	Yes
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46 b 46 c 47 48 48 a 48 a 48 a1 48 b 48 b1 49 a 49 a	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
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Define the process for escalating functional crime risk is issuepotentially suspicious activity derified by employees Yes			
terminating existing customer relationships due to financial crime risk. Define the process for exiting clients for financial crime risk. Define the process and controls to identify and handle customers but ever previously eatled for relationship. Part of the process and controls to identify and handle customers but ever previously eatled for relationship. Define the processes may be a control to the control of the con	49 i	issues/potentially suspicious activity identified by	Yes
crime reasons that applies across the entity, including foreign branches and affiliates. 49 I Define the process and controls to identify and handle customers that were previously saled or financial crime reasons if they seek to re-astablish a relationship. 49 m Cutline the processes regarding screening for an across the control of	49 j	terminating existing customer relationships due to	Yes
handle customers that were previously exited for financial crime resons if they seek for resibilish a relationship of sanctions, PEPs and Adverse Media/Negative News 49 n	49 k	crime reasons that applies across the entity,	Yes
sanctions, PEPs and Adverse Media/Negative News Yes 9 n	491	handle customers that were previously exited for financial crime reasons if they seek to re-establish a	Yes
internal *vacionists* Yes	49 m		Yes
similar document which defines a risk boundary around their business? 51 a Does the Entity have record retention procedures that comply with applicable laws? 51 a If Y, what is the retention period? 52 Confirm that all responses provided in the above Section are representative of all the LE's branches 53 If appropriate, provide any additional information/context to the answers in this section. 53 If appropriate, provide any additional information/context to the answers in this section. 54 Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: 54 Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 55 Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 55 Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 55 Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 55 Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 55 Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 56 Des the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 57 Transaction Screening 58 A Transaction Screening 59 Governance Yes 50 A Transaction Screening Yes 51 Transaction Screening Yes 52 A Transaction Screening Yes 53 A Transaction Screening Yes 54 A Transaction Screening Yes 55 A Transaction Screening Yes 56 A Transaction Screening Yes 57 A Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 77 A Client Yes 57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 78 A Client Yes 58 A Customer Due Diligence Yes 58 A Customer Due Diligence Yes 58 B Covernance Yes 58 B Covernance Yes 58 B Covernance Yes	49 n		Yes
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52 Confirm that all responses provided in the above section are representative of all the LE's branches 52 a If N, clarify which questions the difference's relate to and the branch'es that this applies to. 53 If appropriate, provide any additional information/context to the answers in this section. 54 Does the Entity's AMIL & CITE EWRA cover the inherent risk components detailed below: 54 Client Yes 54 Product Yes 54 Ceography Yes 55 Does the Entity's AMIL & CITE EWRA cover the controls effectiveness components detailed below: 55 Does the Entity's AMIL & CITE EWRA cover the controls effectiveness components detailed below: 55 Does the Entity and CITE EWRA cover the controls effectiveness components detailed below: 55 Does the Entity and CITE EWRA cover the controls effectiveness components detailed below: 55 Does the Entity and CITE EWRA been completed in the last 12 months? 56 Dranagement Information Yes 57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 58 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 58 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 Does The Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	51		Yes
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If N, clarify which questions the difference's relate to and the branch/ee that this applies to.	52		Yes
information/context to the answers in this section. 6. AML_CTF & SANCTIONS RISK ASSESSMENT 54 Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: 54 a Client Yes 54 b Product Yes 54 c Channel Yes 55 d Geography Yes 55 Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 55 a Transaction Monitoring Yes 55 b C Sustomer Due Diligence Yes 55 c PEP Identification Yes 55 c PEP Identification Yes 55 d Transaction Screening Yes 56 d Transaction Screening Against Adverse Media/Negative News 55 d Name Screening against Adverse Media/Negative News 56 d Training and Education Yes 56 d Governance Yes 57 d Management Information Yes 58 d If N, provide the date when the last AML & CTF EWRA been completed in the last 12 months? 57 a Client Yes 57 a Client Yes 57 d Geography Yes 58 a Customer Due Diligence Yes 58 b Governance Yes 58 a Customer Due Diligence Yes 58 a Customer Due Diligence Yes 58 b Governance Yes 59 Governance Yes 50 Client Yes 50 Covernance Yes 51 Covernance Yes 52 Covernance Yes 53 Covernance Yes 54 Covernance Yes 55 Covernance Yes 56 Covernance Yes 57 Covernance Yes 58 Covernance Yes 58 Covernance Yes 59 Covernance Yes 59 Covernance Yes 50 Covernance Yes 50 Covernance Yes 50 Covernance Yes 51 Covernance Yes 52 Covernance Yes 53 Covernance Yes 54 Covernance Yes 55 Covernance Yes 56 Covernance Yes 57 Covernance Yes 58 Covernance Yes 59 Covernance Yes 50 Covernance Yes 50 Covernance Yes 50 Covernance Yes 51 Covernance Yes 52 Covernance Yes 53 Covernance Yes 54 Covernance Yes 55 Covernance Yes 56 Covernance Yes 57 Covernance Yes 58 Covernance Yes 59 Covernance Yes 59 Covernance Yes 50 Covernance Yes 50 Cover	52 a	If N, clarify which questions the difference/s relate to	
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54 d Geography Yes 55 Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 55 a Transaction Monitoring Yes 55 b Customer Due Diligence Yes 55 c PEP Identification Yes 55 c Name Screening Yes 55 e Name Screening against Adverse Media/Negative News 55 f Training and Education Yes 55 g Governance Yes 55 h Management Information Yes 55 h Management Information Yes 56 Has the Entity's AML & CTF EWRA been completed in the last 12 months? 56 a If N, provide the date when the last AML & CTF EWRA was completed. 57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 57 a Client Yes 57 b Product Yes 57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 59 Governance Yes	11000000		
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68 a4 Other Please select	
AND	
69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? Yes	
69 a If Y, is this at:	
69 a1 Onboarding Yes	
69 a2 KYC renewal Yes	

69 a3	Trigger event	Yes
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:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	Please select
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	No
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Prohibited
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	EDD on risk-based approach
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	EDD on risk-based approach
		Prohibited
76 g	Marijuana-related Entities	
76 h	MSB/MVTS customers	Restricted
76 i	Non-account customers	Restricted
76 j	Non-Government Organisations	Always subject to EDD
76 k	Non-resident customers	EDD on risk-based approach
76 I	Nuclear power	Prohibited
76 m	Payment Service Providers	Restricted
76 n	PEPs	Always subject to EDD
76 o	PEP Close Associates	Always subject to EDD
76 p	PEP Related	Always 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	Always subject to EDD
200 COCO 101		
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	Always subject to EDD
76 v	Unregulated charities	Prohibited
76 w	Used Car Dealers	Always subject to EDD
76 x 76 y	Virtual Asset Service Providers Other (specify)	Prohibited
77	If restricted, provide details of the restriction	76h. Restricted for only being a sub agent for Western Union and Transfast. 76i. Restricted for check cashing service and foreign currency conversion. 76m. Restricted for only being an agent for Transfast.
78	Does EDD require senior business management and/ or compliance approval?	Yes

78 a	If Y indicate who provides the approval:	Compliance
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Yes
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above 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.	
8. MONIT	TORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Automated
84 a	If manual or combination selected, specify what type of transactions are monitored manually	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Vendor-sourced tools
84 b1	If "Vendor-sourced tool" or 'Both' selected, what is the name of the vendor/tool?	Eastnets SafeWatch AML
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	
Q DAVM	ENT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group	
	Payment Transparency Standards?	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	Anti Money Laundering and Counter Terrorist Financing Instructions No.14/2018 Article 10
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
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC	TIONS	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Both Automated and Manual
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	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?	Eastnets SafeWatch Screening
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	<1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Combination of automated and manual

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	Switzerland AJIB internal list National list issued by respective local authorities.
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.	
	ING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c 112 d	2nd Line of Defence 3rd Line of Defence	Yes Yes
112 d	Third parties to which specific FCC activities have	
112 f	been outsourced Non-employed workers (contractors/consultants)	Not Applicable Not applicable
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and	
114	high-risk products, services and activities? Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 114 a	Does the Entity provide customised training for AML,	Yes Annually

115 a	If N, clarify which questions the difference/s relate to	
115 a	and the branch/es that this applies to.	
	* ·	
116	If appropriate, provide any additional	
110	information/context to the answers in this section.	
40 011415	TV ACCUIDANCE (COMPLIANCE TESTING	
12. QUALI	TY ASSURANCE /COMPLIANCE TESTING Does the Entity have a program wide risk based	
	Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
13. AUDIT		
121	In addition to inspections by the government	
	supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Yearly
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c 123 d	Governance KYC/CDD/EDD and underlying methodologies	Yes Yes
123 e	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j 123 k	Transaction Screening including for sanctions Training & Education	Yes
123 K	Other (specify)	Yes
	Call (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
14. FRAU	UD.	
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes

	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 answers in this section.	
Wolfsberg G	tion Statement Group Correspondent Banking Due Diligence Questionnaire 2023 (CI Statement (To be signed by Global Head of Correspondent Bank	king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of
Anti- Money	y Laundering, Chief Compliance Officer, Global Head of Financial	Crimes Compliance OR equivalent)
every effor		ion name) is fully committed to the fight against financial crime and makes s, regulations and standards in all of the jurisdictions in which it does business and holds accounts.
The Financ		
	ial Institution understands the critical importance of having effecti egulatory obligations.	ve and sustainable controls to combat financial crime in order to protect its reputation and to meet its
legal and re	egulatory obligations.	we and sustainable controls to combat financial crime in order to protect its reputation and to meet its ng parties to transactions in international payments and has adopted/is committed to adopting these
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