Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ) V1.4

the Wolfsberg Group

Financial Institution Name: Location (Country) :

National Bank of Oman SAOG Sultanate of Oman

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.

1. ENTI	TY & OWNERSHIP	
1	Full Legal Name	National Bank of Oman SAOG
2	Append a list of foreign branches which are covered by this questionnaire	All Domestic branches and foreign branches of (UAE)
3	Full Legal (Registered) Address	North Al Udhaybah, Bousher, Muscat, Sultanate of Oman, Way 272 Wadi Al Khalil Street, Building number 20. Mailing address: PO Box 751 PC 112 Ruwi, Sultanate of Oman
4	Full Primary Business Address (if different from above)	same as above
5	Date of Entity incorporation/establishment	28/02/1973
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a 1	If Y, indicate the exchange traded on and ticker symbol	Muscat Securilies Market (NBOB)
6 b	Member Owned/Mutual	No X
6 c	Government or State Owned by 25% or more	No I
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	SUHAIL SALIM ABDLULAH AL MUKHAINI BAHWAN individual owner of 14.75%
7	% of the Entity's total shares composed of bearer shares	NA
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 V
10	Name of primary financial regulator/supervisory authority	Central Bank of Oman , Capital Market Authority, and Central Bank of UAE.
11	Provide Legal Entity Identifier (LEI) if available	549300D3B4Gi1CT73Z02
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	The same no any different

14 Select the business areas applicable to the Entity 14 a Relail Banking Yes 14 b Private Banking Yes 14 c Commercial Banking Yes 14 d Transactional Banking Yes 14 d Transactional Banking Yes 14 f Transactional Banking Yes 14 f Financial Markets Trading Yes 14 f Financial Markets Trading Yes 14 g Securities Services/Custody Yes 14 h Broker/Dealer Yes 14 h Broker/Dealer Yes 14 i Multilateral Development Bank No 14 j Wealth Management Yes 14 k Other (please explain) International banking, and Islamic banking. 15 Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily) resident in a different jurisdiction to the location where bank services are provided) 15 a If Y, provide the top five countries where the non-resident customers are located. Namber of employees 1001-5000 16 a Number of employees 1001-5000 Greater than \$500 million 17 Confirm that all responses provided in the above Section are representative of all the LE's branches. 18 If Appropriate, provide any additional information/context to the answers in this section.	
14 a Retail Banking Yes 14 b Private Banking Yes 14 c Commercial Banking Yes 14 d Transactional Banking Yes 14 d Investment Banking Yes 14 e Investment Banking Yes 14 f Financial Markets Trading Yes 14 g Securities Services/Custody Yes 14 h Broker/Dealer Yes 14 h Broker/Dealer Yes 14 h Wetalth Management Yes 14 j Wealth Management Yes 14 k Other (please explain) International banking, and Islamic banking. 15 Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided) 15 a If Y, provide the top five countries where the non-resident customers are located. Number of employees 1001-5000 16 a Number of employees 1001-5000 Greater than \$500 million Yes 17 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
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and the branch/es that this applies to. 18 If appropriate, provide any additional	
2. PRODUCTS & SERVICES	
19 Does the Entity offer the following products and	<u> </u>
services:	
19 a Correspondent Banking Yes	
19 a1 If Y	
19 a1a Does the Entity offer Correspondent Banking services to domestic banks?	▼
19 a1b Does the Entity allow domestic bank clients to provide downstream relationships?	-
19 a1c Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	~
19 a1d Does the Entity offer Correspondent Banking services to foreign banks?	-
19 a1e Does the Entity allow downstream relationships with foreign banks?	<u></u>
19 a1f Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	▼
19 a1g Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	\
19 a1h Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	
(PSPs)?	
(PSPs)?	

,		
19 a1i	Does the Entity have processes and procedures	
	in place to identify downstream relationships with MSBs /MVTSs/PSPs?	Yes ▼
	W	اسبها
19 b	Cross-Border Bulk Cash Delivery	Yes
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	Yes
19 e	Hold Mail	No
19 f	International Cash Letter	No C.
19 g	Low Price Securities	No East
19 h	Payable Through Accounts	No Control Con
19 i	Payment services to non-bank entities who may	NO Kinns
	then offer third party payment services to their customers?	Yes
19 j1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	Yes
19 i3	Virtual Asset Service Providers (VASPs)	No Comment
19 4	eCommerce Platforms	Yes
19 15	Other - Please explain	Les Levin
19 j	Private Banking	Domestic
19 k	Remote Deposit Capture (RDC)	Yes
19 l	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	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	Yes
19 p1a	If yes, state the applicable level of due diligence	Identification and verification
19 p2	Wire transfers	No Iven
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	Please select
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	19 P1: Yes, This is for Local CHQ Clearing services through regulatory clearing platform (ICCS)
•	please provide more detail here, including describing the level of due diligence.	wherein the beneficiary of CHQs are limited for resident individuals / entities banking with Oman based banks. Thus, NBO facilitate clearing suh CHQs to walk-in Customers based on NBO Clients CHQ orders only. CHQ Beneficiaries are subject ID&V checks and screening as well
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	National Control of Co
	and the branch/es that this applies to.	
21	If appropriate, provide any additional	19b. The cross border bulk cash delivery is strictly limited to NBO branches located in Musandam
	information/context to the answers in this section.	region between UAE and Sultanate of Oman borders.
	information/context to the answers in this section.	
3. AML, C 22	TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	region between UAE and Sultanate of Örnan borders.
3. AML, C 22 22 a	information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AMI, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient	region between UAE and Sultanate of Örnan borders. Yes
3. AML, C 22 22 a 22 b	information/context to the answers in this section. TF. & 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 Yes
3. AML, C 22 22 a 22 b 22 c	information/context to the answers in this section. TF & 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	Yes Yes Yes
3. AML, C 22 22 a 22 b 22 c	information/context to the answers in this section. TF & 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 Yes
3. AML, C 22 22 a 22 b 22 c	information/context to the answers in this section. TF & 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	Yes Yes Yes Yes
3. AML, C 22 a 22 b 22 c 22 d	information/context to the answers in this section. TF & 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 Yes Yes Yes Yes Yes Yes Yes
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3. AML, C 22 22 a 22 b 22 c 22 d 22 d 22 e 22 f	information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AMI, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Yes
3. AML, C 22 a 22 b 22 c 22 d 22 e 22 e 22 f 22 g 22 h	information/context to the answers in this section. TF & 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
3. AML, C 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i	information/context to the answers in this section. TF & 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	region between UAE and Sultanate of Oman borders. Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
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22 m	Suspicious Activity Reporting	Yes	
22 n	Training and Education	Yes	
22 o	Transaction Monitoring	Yes	أسسا
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	11-100	Ŧ
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 а	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	Ŧ
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.	26: the Bank is performing AML, CTF and sanctions activities in house and no third parties involvements.	
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	T
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes	T
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:		414
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	4
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	v
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	v
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes	T

40 Ь	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:		19.63
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	T
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	T
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Q42e Q42f ABC Training is mandatory as part of agreement T&Cs with such parties i.e. vendor, outsource workers, etc.	ed
45	If appropriate, provide any additional information/context to the answers in this section.		
5. AML. C	TF & SANCTIONS POLICIES & PROCEDURES		álais
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:		
46 a	Money laundering	Yes	
46 b	Terrorist financing	Yes	السينة
46 c	Sanctions violations	Yes	أسننيه
47	Are the Entity's policies and procedures updated at least annually?	Yes	
48	Has the Entity chosen to compare its policies and procedures against:		
48 a	U.S. Standards	Yes	
48 a1	If Y, does the Entity retain a record of the results?	Yes	
48 b	EU Standards	Yes	
48 b1	If Y, does the Entity retain a record of the results?	Yes	3
49	Does the Entity have policies and procedures that		1964
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes	~
49 Ь	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes	¥
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes	₹
49 d	Prohibit accounts/relationships with shell banks	Yes	
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes	┰
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes	F
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de	Yes	
	change or money transfer agents		1. 1

49 i		
	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
491	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	5 years or more
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context to the answers in this section.	
S AMI CT	TF & SANCTIONS RISK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 a	Client	Yes
54 b	Product	V-
	Fibauct	Yes
54 c	Channel	Yes S
54 c 54 d	Channel Geography	
54 c	Channel	Yes
54 c 54 d	Channel Geography Does the Entity's AML & CTF EWRA cover the	Yes
54 c 54 d 55 55 a 55 b	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Tes Tes Tes Tes Tes Tes Tes Tes Tes T
54 c 54 d 55 55 a 55 b 55 c	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes Yes Yes Yes Yes Yes Yes
54 c 54 d 55 55 a 55 b	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dilligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative	Yes Yes L Yes Yes Yes Yes Yes Yes L Yes L Yes
54 c 54 d 55 55 a 55 b 55 c 55 c 55 d 55 e	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dillgence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes Yes L Yes Yes Yes Yes Yes L Yes Yes L Yes Yes L Yes
54 c 54 d 55 55 a 55 b 55 c 55 d 55 e	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dillgence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes
54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dillgence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes
54 c 54 d 55 55 a 55 b 55 c 55 d 55 e	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dillgence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes
54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dilligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed	Yes
54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 f 55 g	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dilligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
54 c 54 d 55 55 a 55 a 55 b 55 c 55 c 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a 57 57 a 57 c	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dillgence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
54 c 54 d 55 55 a 55 a 55 b 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 57 57 a 57 a 57 c 57 d	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dilligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes Image: Control of the control o
54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a 57 57 a 57 c	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dillgence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
54 c 54 d 55 55 a 55 a 55 b 55 c 55 c 55 d 55 e 55 f 55 g 55 h 56 57 57 a 57 a 57 c 57 d	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	Yes
54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 c 55 d 55 e 55 f 55 a 55 f 55 g 55 h 56 a 57 57 a 57 a 57 c 57 d 58 58 a 58 a	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes Image: Control of the control o
54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 c 55 d 55 e 55 f 56 a 57 57 a 57 a 57 c 57 d 58 58	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes

a di .

58 e	Name Screening	Vac	
58 f	Transaction Screening	Yes Yes	
58 g	Training and Education	Yes	-
59 59	Has the Entity's Sanctions EWRA been completed in	res	نسسا
33	the last 12 months?	Yes	v
59 a	If N, provide the date when the last Sanctions		ADDEN 3
	EWRA was completed.		
•			
60	Confirm that all responses provided in the above		
**	Section are representative of all the LE's branches	Yes	-
60 a	If N, clarify which questions the difference/s relate to		
100 1	and the branch/es that this applies to.		
61	If appropriate, provide any additional		
	information/context to the answers in this section.		
7 440	DD and EDD		eregaine
62	Does the Entity verify the identity of the customer?	Tv	3/2963
63	Do the Entity's policies and procedures set out when	Yes	فيستا
	CDD must be completed, e.g. at the time of	Yes	الا
	onboarding or within 30 days?		
64	Which of the following does the Entity gather and		Albertait
	retain when conducting CDD? Select all that apply:		
64 a	Customer identification	Yes	
64 b	Expected activity	Yes	تنسيبا
64 c	Nature of business/employment	Yes	3
64 d	Ownership structure		Y
64 e	Product usage	Yes	
64 f	Purpose and nature of relationship		Y
64 g	Source of funds		الدورين
64 h	Source of wealth		
65	Are each of the following identified:		44(23)
65 a	Ultimate beneficial ownership		
65 a1	Are ultimate beneficial owners verified?	Yes	Y
65 b	Authorised signatories (where applicable)	Yes	Y
65 c	Key controllers	Yes	
65 d	Other relevant parties	Yes	
66	What is the Entity's minimum (lowest) threshold	25%	
	applied to beneficial ownership identification?	23%	
67	Does the due diligence process result in customers	Yes	
	receiving a risk classification?	165	
67 a	If Y, what factors/criteria are used to determine the	[발문 경기는 경우 교통 기업	
	customer's risk classification? Select all that apply:		
67 a1	customer's risk classification? Select all that apply: Product Usage	Yes	لسا
67 a1 67 a2	customer's risk classification? Select all that apply: Product Usage Geography	Yes	اسسا السسا
67 a1 67 a2 67 a3	customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry	Yes Yes	
67 a1 67 a2 67 a3 67 a4	customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type	Yes Yes Yes	
67 a1 67 a2 67 a3 67 a4 67 a5	customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information	Yes Yes Yes	
67 a1 67 a2 67 a3 67 a4	customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type	Yes Yes Yes	
67 a1 67 a2 67 a3 67 a4 67 a5	customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information	Yes Yes Yes	
67 a1 67 a2 67 a3 67 a4 67 a5	customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information	Yes Yes Yes	
67 a1 67 a2 67 a3 67 a4 67 a5 67 a6	customer's risk classification? Select all that apply: Product Usage Geography Business TypelIndustry Legal Entity type Adverse Information Other (specify)	Yes Yes Yes	
67 a1 67 a2 67 a3 67 a4 67 a5	customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a	Yes Yes Yes Yes Yes	
67 a1 67 a2 67 a3 67 a4 67 a5 67 a6	customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process?	Yes Yes Yes Yes Yes Yes Yes	
67 a1 67 a2 67 a3 67 a4 67 a5 67 a6	customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at:	Yes Yes Yes Yes Yes Yes Yes	_ 1
67 a1 67 a2 67 a3 67 a4 67 a5 67 a6 68 a	customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding	Yes Yes Yes Yes Yes Yes Yes Yes	
67 a1 67 a2 67 a3 67 a4 67 a5 67 a6 68 a 68 a 68 a1 68 a2	customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal	Yes Yes Yes Yes Yes Yes Yes Yes	_ 1
67 a1 67 a2 67 a3 67 a4 67 a5 67 a6 68 68 68 a 68 a1 68 a2 68 a3	customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event	Yes	_ 1
67 a1 67 a2 67 a3 67 a4 67 a5 67 a6 68 68 68 a 68 a1 68 a2 68 a3 68 a4	customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other	Yes Yes Yes Yes Yes Yes Yes Yes	_ 1
67 a1 67 a2 67 a3 67 a4 67 a5 67 a6 68 68 68 a 68 a1 68 a2 68 a3	customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event	Yes	_ 1
67 a1 67 a2 67 a3 67 a4 67 a5 67 a6 68 68 68 a 68 a1 68 a2 68 a3 68 a4	customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other	Yes	_ 1
67 a1 67 a2 67 a3 67 a4 67 a5 67 a6 68 68 68 a 68 a1 68 a2 68 a3 68 a4	customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other	Yes	_ 1
67 a1 67 a2 67 a3 67 a4 67 a5 67 a6 68 a 68 a 68 a1 68 a2 68 a3 68 a4 68 a4a	customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other"	Yes	_ 1
67 a1 67 a2 67 a3 67 a4 67 a5 67 a6 68 68 68 a 68 a1 68 a2 68 a3 68 a4	customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other"	Yes	_ 1
67 a1 67 a2 67 a3 67 a4 67 a5 67 a6 68 a 68 a 68 a1 68 a2 68 a3 68 a4 68 a4a	customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other" Does the Entity have a risk based approach to screening customers for Adverse Media/Negative	Yes	_ 1
67 a1 67 a2 67 a3 67 a4 67 a5 67 a6 68 68 a 68 a1 68 a2 69 a3 68 a4 68 a4 68 a4	customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other" Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes Yes Yes Yes Yes Yes Yes Yes Yes	_ 1
67 a1 67 a2 67 a3 67 a4 67 a5 67 a6 68 a 68 a1 68 a2 68 a3 68 a4 68 a4 69	customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other" Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? If Y, is this at:	Yes Yes Yes Yes Yes Yes Yes Yes Yes	_ 1
67 a1 67 a2 67 a3 67 a4 67 a5 67 a6 68 68 a 68 a1 68 a2 68 a3 68 a4 68 a4	customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other" Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes Yes Yes Yes Yes Yes Yes Yes Yes	

69 a3	Trigger event	Yes	Y
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Combination of automated and manual	▼
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?		¥
71 a	If Y, is this at:		1,11,144.5
71 a1	Onboarding	Yes	
71 a2	KYC renewal	Yes	
71 a3	Trigger event	Yes	ليسنا
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual	I.Z.
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	Y
74 a	If yes, select all that apply:		
74 a1	Less than one year	Yes	
74 a2	1 – 2 years	Yes	أنست
74 a3	3 – 4 years	Yes	.Y.
74 a4	5 years or more	Yes	
74 a5	Trigger-based or perpetual monitoring reviews	Yes	Y
74 a6	Other (Please specify)	High risk customers KYC review every years. Mediium risk customers KYC review every three years Low risk customers KYC review every five 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	Always subject to EDD	Y
76 b	Respondent Banks	EDD on risk-based approach	Y
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes	J S
76 c	Embassies/Consulates	EDD on risk-based approach	\Box
76 d	Extractive industries	Always subject to EDD	Y
76 e	Gambling customers	Prohibited	Y
76 f	General Trading Companies	EDD on risk-based approach	Ŧ
76 g	Marijuana-related Entities	Prohibited	
76 h	MSB/MVTS customers	Atways subject to EDD	A.
76 i	Non-account customers	Always subject to EDD	X.
76 j	Non-Government Organisations	EDD on risk-based approach	
76 k	Non-resident customers	Always subject to EDD	
76 1	Nuclear power	Prohibited	Y.
76 m	Payment Service Providers	Always subject to EDO	Y
76 n	PEPs	Always subject to EDD	Ŧ
76 o	PEP Close Associates	Always subject to EDD	$\overline{\mathbf{x}}$
76 p	PEP Related	Always subject to EDD	豆
76 q	Precious metals and stones	Always subject to EDD	V
		Prohibited	<u></u>
76 r	Red light businesses/Adult entertainment		
76 s	Regulated charities	Always subject to EDD	
76 t	Shell banks	Prohibited	
76 u	Travel and Tour Companies	EDD on risk-based approach	Y
76 v	Unregulated charities	Prohibited	.¥.
76 w	Used Car Dealers	Always subject to EDD	T.
76 x	Virtual Asset Service Providers	Do not have this category of customer or industry	Y
76 y	Other (specify)		
77	If restricted, provide details of the restriction		
78	Does EDD require senior business management and/ or compliance approval?	Yes	_

78 a	If Y indicate who provides the approval:	Both
79	Does the Entity have specific procedures for	The state of the s
	onboarding entities that handle client money such as	Yes
	lawyers, accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or	Yes
	quality review on clients subject to EDD?	
81	Confirm that all responses provided in the above	Yes
n	Section are representative of all the LE's branches	
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. MONE	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?	OMNI Enterprise from Kiya (Infrasoft Technologies LTD)
84 b2	When was the tool last updated?	1-2 years
84 b3	When was the automated Transaction Monitoring application last calibrated?	1-2 years
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.	
O DAVIE	THE TO A LICEA DELICY	
9. PAYMI	ENT TRANSPARENCY Does the Entity adhere to the Wolfsberg Group	

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	Sultanate of Oman Royal Decree (30/2016) and related CBO AML Laws, circulars and guidelines.
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	L
98	Does the Entity have a Sanctions Policy approved by	
30	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?	Automated
102 в	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?	Safe Watch from EastNets.
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 too!? (If 'Other' please explain in Question 110)	1-2 years
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
	What is the method used by the Entity?	

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes	V
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:		1 3 41 3 5 14 3 4 5 2
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data	. T.
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	Y
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	Not used	
106 f	Other (specify)	The bank is also using Oman local terrorist list NCTC, UAE list ,and bank internal lists.	
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	قىنىدە
107 b	Transactions	Same day to 2 business days	3
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. TRAININ	IG & EDUCATION		
111	Does the Entity provide mandatory training, which includes:		
111 a	Identification and reporting of transactions to government authorities	Yes	_
111 Ь	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes	No.
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	
11 e	Conduct and Culture	Yes	шиш
111 f	Fraud	Yes	ئىسا
112	Is the above mandatory training provided to:		100
12 a 12 b	Board and Senior Committee Management 1st Line of Defence	Yes	
112 B	2nd Line of Defence	Yes Yes	
12 d	3rd Line of Defence	Yes	
12 e	Third parties to which specific FCC activities have been outsourced	Yes	Ŧ
12 f	Non-employed workers (contractors/consultants)	Yes	
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?		
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes	₹
	l .	Annually	
14 a	If Y, how frequently is training delivered?	Military	212/20
14 a 15	Confirm that all responses provided in the above	Yes	. 1

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
		ALL STATE OF THE S
116	If appropriate, provide any additional information/context to the answers in this section.	
	International Control of the Control	
12. QUALIT	Y 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	TV.
	Compliance Testing process (separate from the	Yes Yes
119	independent Audit function)? Confirm that all responses provided in the above	London London
119	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	Up addition to inspecting by the accomment	T — — —
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	Yes
	practices on a regular basis?	
122	How often is the Entity audited on its AML, CTF, ABC,	
122	Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Compenent-based reviews
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	Yes Yes Yes Yes Yes Yes Yes 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 123 i	Technology Transaction Monitoring	Yes Yes
123 [Transaction Screening including for sanctions	Yes Yes
123 k	Training & Education	Yes
123 I	Other (specify)	
124	Are adverse findings from internal & external audit	
	tracked to completion and assessed for adequacy	Yes
	and completeness?	
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	(acco.)
	and the branch/es that this applies to.	
	1	
126	If appropriate, provide any additional	
126	If appropriate, provide any additional information/context to the answers in this section.	
126		
14. FRAU	information/context to the answers in this section.	
126 14. FRAU 127	information/context to the answers in this section. D Does the Entity have policies in place addressing	Yes
14. FRAU	information/context to the answers in this section.	Yes

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ) V1.4

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 answers in this section.			
Declaratio	n 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)				
		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 Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.				
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.				
The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.				
The Financial Institution commits to file accurate supplemental information on a timely basis.				
I, Taqwa Al Li the answers pi Institution.	GROBI Read of	of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that my honest belief, and that I am authorised to execute this declaration on behalf of the Financial		
i, Issam at B Wolfsberg CBI	(MLNO of equi	ivalent), certify that I have read and understood this declaration, that the answers provided in this am authorised to execute this declaration on behalf of the Financial Institution.		
9 July 2024	(Signature & Dat	e)		
9 July 2024	5.7.2024 (Signature & Dat	e)		

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