

Financial Institution Name: Location (Country) :

United Bulgarian Bank AD Bulgaria

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
	& OWNERSHIP	7.1101101
1	Full Legal Name	United Bulgarian Bank AD
2	Append a list of foreign branches which are covered by this questionnaire	The whole branch network of UBB AD consists of: 199 branches, all of them located in Bulgaria
3	Full Legal (Registered) Address	Bulgaria, Sofia, 89B Vitosha Blvd.
4	Full Primary Business Address (if different from above)	Bulgaria, Sofia, 89B Vitosha Blvd.
5	Date of Entity incorporation/establishment	1992
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No 🔽
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	No 🔽
6 c	Government or State Owned by 25% or more	No 🔽
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	The persons, holding position as a senior managerial official in the cases when no other individual can be established as UBO: 1. Peter Andronov, date of birth 25/02/1969 2. Christine Nadine M Van Rijsseghem, date of birth 24/10/1962
7	% of the Entity's total shares composed of bearer shares	0% KBC Bank NV only has nominative and dematerialized shares.
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	Not applicable
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	Bulgarian National Bank
11	Provide Legal Entity Identifier (LEI) if available	5299000PCY1EP8QJFV48
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	KBC Bank NV Brussels, Belgium UBB is owned 99.96% by KBC Bank NV. KBC Group NV shares are traded publicly on NYSE Euronext

13	Jurisdiction of licensing authority and regulator of	Brussels, Belgium	
	ultimate parent	National Bank of Belgium	
14	Select the business areas applicable to the Entity		
14 a	Retail Banking	Yes	
14 b	Private Banking	Yes	
14 c	Commercial Banking	Yes	
14 d	Transactional Banking	Yes	〓
14 u			
	Investment Banking	Yes	
14 f	Financial Markets Trading	Yes	
14 g	Securities Services/Custody	Yes	
14 h	Broker/Dealer	Yes	
14 i	Multilateral Development Bank	No	
14 j	Wealth Management	No	
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	$ \mathbf{v} $
	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	1001-5000	_
	Total Assets		=
16 b		Greater than \$500 million	
17	Confirm that all responses provided in the above	Yes	$ \downarrow $
	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.		
18	If appropriate, provide any additional		
10	information/context to the answers in this section.		
	information/context to the answers in this section.		
2. PRODU	CTS & SERVICES		
19	Does the Entity offer the following products and		
	services:		
19 a	Correspondent Banking	No	$\overline{}$
10 1	1637		
19 a1	If Y Does the Entity offer Correspondent Banking		_
19 a1a	services to domestic banks?	Please select	$ \mathbf{v} $
40 - 41:			_
19 a1b	Does the Entity allow domestic bank clients to	Please select	\downarrow
	provide downstream relationships?		
19 a1c	Does the Entity have processes and procedures		
	in place to identify downstream relationships with	Please select	$ \mathbf{v} $
	domestic banks?		
19 a1d	Does the Entity offer Correspondent Banking		Ŧ
	services to foreign banks?	Please select	$ \mathbf{v} $
19 a1e	Does the Entity allow downstream relationships		
13 a le	with foreign banks?	Please select	$ \mathbf{v} $
10 15	-		
19 a1f	Does the Entity have processes and procedures		
	in place to identify downstream relationships with	Please select	$ \mathbf{v} $
	foreign banks?		
19 a1g	Does the Entity offer Correspondent Banking		
	services to regulated Money Services Businesses	Please select	-
	(MSBs)/Money Value Transfer Services (MVTSs)?	1 10000 301001	
10 015			_
19 a1h	Does the Entity allow downstream relationships		
	with MSBs, MVTSs, or Payment Service Provider		
	(PSPs)?		
19 a1h1	MSBs	No	
40 - 41-0	MVTSs	No	
19 a1h2			
19 a1h2	PSPs	No	

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	No	•
19 b	Cross-Border Bulk Cash Delivery	No	Ξ
19 c	Cross-Border Remittances	Yes	
19 d	Domestic Bulk Cash Delivery	No	
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?	Yes	•
19 i1	If Y , please select all that apply below?		
19 i2	Third Party Payment Service Providers	Yes	
19 i3	Virtual Asset Service Providers (VASPs)	No	
19 i4	eCommerce Platforms	No	
19 i5	Other - Please explain	No clearing services for FI clients, including PSP clients, provided.	
19 j	Private Banking	Domestic	
19 k	Remote Deposit Capture (RDC)	No	
19 I	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	No	
19 p1a	If yes, state the applicable level of due diligence	Please select	
19 p2	Wire transfers	No	
19 p2a	If yes, state the applicable level of due diligence	Please select	
19 p3	Foreign currency conversion	Yes	
19 p3a	If yes, state the applicable level of due diligence	No due diligence (Not required)	
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.	UBB has walk-in customers only for currency exchange under EUR 1000 and cash payment of charges to the regulators under EUR 1000.	
19 q	Other high-risk products and services identified by the Entity (please specify)		
19 q	,	Yes	~
·	the Entity (please specify) Confirm that all responses provided in the above	Yes	V
20	the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to	Yes	•
20 20 a	the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Yes	V
20 20 a	the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Yes	V
20 a 21 3. AML, C	the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:		•
20 20 a 21 3. AML, C 22 22 a	the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. 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	Yes	
20 20 a 21 3. AML, C 22 22 a 22 b	the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. 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	
20 20 a 21 3. AML, C 22 22 a 22 b 22 c	the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. 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	
20 20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d	the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. 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	
20 20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 e	the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. 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	Yes Yes Yes Yes Yes Yes Yes Yes	
20 a 21 a 21 a 22 a 22 b 22 c 22 d 22 e 22 f	the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. 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	Yes Yes Yes Yes Yes Yes Yes Yes	
20 20 a 21 3. AML, C 22 2 2 b 22 c 22 c 22 c 22 f 22 g	the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. 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	Yes	
20 20 a 21 3. AML, C 22 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 1 2 2 9 2 2 h	the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. 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 Independent Testing Periodic Review	Yes	
20 20 a 21 3. AML, C 22 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i	the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. 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	Yes	
20 20 a 21 21 3. AML, C 22 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 j	the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. 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 PEP Screening	Yes	
20 20 a 21 3. AML, C 22 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i	the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. 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	Yes	

22 m	Suspicious Activity Reporting	Voc	_
22 m 22 n	Training and Education	Yes Yes	늗
22 o	Transaction Monitoring	Yes	늗
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	11-100	_
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Yes	•
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes	_
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes	•
26 a	If Y, provide further details	FIG CAU Unit within Share Service Center Brno, part of KBC Group, KYC and Customer acceptance of banking and non banking institutions. 1st line embargo screening is performed in SSC Brno.	1
27	Does the entity have a whistleblower policy?	Yes	
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	•
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
29	If appropriate, provide any additional information/context to the answers in this section.		
4. ANTI	BRIBERY & CORRUPTION		
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes	•
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes	—
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes	•
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes	•
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity	\equiv
35	Does the Entity have a global ABC policy that:		
35 а	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	T
35 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes	~
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes	•
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes	V
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	Yes	•
42 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable	lacksquare
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes	
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
45	If appropriate, provide any additional information/context to the answers in this section.		
5 AMI C	CTF & SANCTIONS POLICIES & PROCEDURES		
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent,		
	detect and report:		
46 a	detect and report: Money laundering	Yes	
46 b	detect and report: Money laundering Terrorist financing	Yes Yes	
46 b 46 c	detect and report: Money laundering Terrorist financing Sanctions violations		
46 b 46 c 47	detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually?	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 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?	Yes Yes Yes	
46 b 46 c 47 48 48 a 48 a 48 a1 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 No	
46 b 46 c 47 48 48 a 48 a 48 a 48 b 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 If Y, does the Entity retain a record of the results?	Yes Yes Yes No Not Applicable	
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 No Not Applicable Yes	
46 b 46 c 47 48 48 a 48 a 48 a 48 b 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 If Y, does the Entity retain a record of the results?	Yes Yes Yes No Not Applicable Yes	
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: Prohibit the opening and keeping of anonymous	Yes Yes Yes No Not Applicable Yes Yes	
46 b 46 c 47 48 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	Yes Yes Yes No Not Applicable Yes Yes Yes	
46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b 49 a 49 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 If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes Yes Yes No Not Applicable Yes Yes Yes Yes	
46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 d 49 a 49 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 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 Yes Yes Yes No No Not Applicable Yes Yes Yes Yes Yes Yes	
46 b 46 c 47 48 48 a 48 a 48 a1 48 b 49 b 49 c 49 d	detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides	Yes Yes Yes Yes No Not Applicable Yes Yes Yes Yes Yes Yes Yes	
46 b 46 c 47 48 48 a 48 a 48 a1 48 b 49 b 49 c 49 d 49 e	detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for	Yes Yes Yes Yes No No Not Applicable Yes Yes Yes Yes Yes Yes Yes	
46 b 46 c 47 48 48 a 48 a 48 b 48 b 48 b 49 b 49 c 49 d 49 e	detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de	Yes Yes Yes Yes No No Not Applicable Yes Yes Yes Yes Yes Yes Yes Yes	

49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes	•
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes	•
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes	•
49	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes	•
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes	•
49 n	Outline the processes for the maintenance of 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	$\overline{\mathbf{v}}$
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.		
6 AMI CT	FF & SANCTIONS RISK ASSESSMENT		
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:		
54 a	Client	Yes	
54 b	Product	Yes	
54 c	Channel	Yes	
54 d 55	Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes	
55 a	Transaction Monitoring	Yes	
55 b	Customer Due Diligence	Yes	
55 c	PEP Identification	Yes	
55 d 55 e	Transaction Screening	Yes	
	Name Screening against Adverse Media/Negative News	Yes	lacksquare
55 f	Training and Education	Yes	
55 g 55 h	Governance Management Information	Yes	
56 n	Management Information	Yes	
	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes	V
56 a	Has the Entity's AML & CTF EWRA been completed	Yes	~
57	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	▼
57 57 a	Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes	▼
57 57 a 57 b	Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes Yes	▼
57 a 57 b 57 c	Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Yes Yes	▼
57 a 57 b 57 c 57 d	Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes Yes	▼
57 a 57 b 57 c 57 d 58	Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes Yes Yes Yes Yes	
57 a 57 b 57 c 57 d 58	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 Yes Yes Yes Yes Yes	
57 a 57 a 57 b 57 c 57 d 58 58 a 58 a	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 Yes Yes Yes Yes Yes Yes	
57 a 57 b 57 c 57 d 58 58 a	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 Yes Yes Yes Yes Yes	

	T		
58 e	Name Screening	Yes	
58 f	Transaction Screening	Yes	
58 g	Training and Education	Yes	
59	Has the Entity's Sanctions EWRA been completed in	Von	$ \mathbf{v} $
	the last 12 months?	Yes	
59 a	If N, provide the date when the last Sanctions 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 and the branch/es that this applies to.		
	If appropriate, provide any additional information/context to the answers in this section.		
7. KYC, CI	DD and EDD		
62	Does the Entity verify the identity of the customer?	Yes	
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes	•
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:		
64 a	Customer identification	Yes	
64 b	Expected activity	Yes	
64 c	Nature of business/employment	Yes	
64 d	Ownership structure	Yes	
64 e	Product usage	Yes	
64 f	Purpose and nature of relationship	Yes	
64 g	Source of funds	Yes	
64 h	Source of wealth	Yes	
65	Are each of the following identified:	100	
65 a	Ultimate beneficial ownership	Voo	_
65 a1	•	Yes	
	Are ultimate beneficial owners verified?	Yes	
65 b	Authorised signatories (where applicable)	Yes	
65 c	Key controllers	Yes	=
65 d	Other relevant parties	Yes	\blacksquare
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	25%	▼
67	Does the due diligence process result in customers receiving a risk classification?	Yes	lacksquare
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:		
67 a1	Product Usage	Yes	
67 a2	Geography	Yes	
67 a3	Business Type/Industry	Yes	
67 a4	Legal Entity type	Yes	
67 a5	Adverse Information	Yes	\mathbf{V}
67 a6	Other (specify)		
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes	lacksquare
68 a	If Y, is this at:		
68 a1	Onboarding	No	V
68 a2	KYC renewal	No	
68 a3	Trigger event	No	
68 a4	Other	Yes	
68 a4a	If yes, please specify "Other"	Only for credit clients	
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	\blacksquare
70	What is the method used by the Entity to screen for	res	otan
	Adverse Media/Negative News?	Combination of automated and manual	lacksquare
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?		•
71 a	If Y, is this at:		_
71 a1	Onboarding	Yes	
71 a2	KYC renewal	Yes	
71 a3	Trigger event	Yes	
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual	
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes	•
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes	•
74 a	If yes, select all that apply:		
74 a1	Less than one year	No	
74 a2	1 – 2 years	Yes	
74 a3	3 – 4 years	Yes	V
74 a4	5 years or more	No	
74 a5 74 a6	Trigger-based or perpetual monitoring reviews	Yes	
75	Other (Please specify) 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	
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	\blacksquare
76 d	Extractive industries	Always subject to EDD	V
76 e	Gambling customers	Always subject to EDD	
76 f	General Trading Companies	EDD on risk-based approach	
76 g	Marijuana-related Entities	Prohibited	<u> </u>
76 h	MSB/MVTS customers	Always subject to EDD	
		· · ·	
76 i	Non-account customers	EDD on risk-based approach	
76 j	Non-Government Organisations	Always subject to EDD	
76 k	Non-resident customers	EDD on risk-based approach	
76 I	Nuclear power	Restricted	
76 m	Payment Service Providers	Always subject to EDD	
76 n	PEPs	Always subject to EDD	
76 o	PEP Close Associates	Always subject to EDD	
76 p	PEP Related	Always subject to EDD	
76 q	Precious metals and stones	Always subject to EDD	V
76 r	Red light businesses/Adult entertainment	Prohibited	V
76 s	Regulated charities	EDD on risk-based approach	V
76 t	Shell banks	Prohibited	V
76 u	Travel and Tour Companies	EDD on risk-based approach	
76 v	Unregulated charities	Always subject to EDD	V
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	V
76 y	Other (specify)	BOTHER HAVE THIS CAREGORY OF CASICILIES OF INCUSARY	
77	If restricted, provide details of the restriction	Restriction on provision of certain products and services: granting loans, POS, maintaining m than one account, usage of mobile banking, enhanced transaction monitoring, ex ante transa execution check. The restrictions are specific depending on the categories of customers or industries, e.g.: banking relations with nuclear industry or gambling industry are provided und strict condition that the entities are only licensed by the Bulgarian authorities.	ction
78	Does EDD require senior business management and/ or compliance approval?	Yes	•
	•		

=0	T (CV) III of the control of the con	T	
78 a	If Y indicate who provides the approval:	Both	듣
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.	Adverse news screening for sanctions (using World Check) is done during onboarding and on a daily basis. UBB does not per definition exclude specific categories of clients or activities and always applies an individual risk assessment on a case-by-case basis.	а
8. MONIT	ORING & REPORTING		
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes	•
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual	•
84 a	If manual or combination selected, specify what type of transactions are monitored manually	Business units are obliged to raise internal notification when red flags are identified when servic clients face-to-face. Trade Finance transactions are also screened manually, however underlying payments are (be execution) screened (automatically) with the transaction screenings.	•
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Both	•
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	Netreveal, Asseco SEE (https://see.asseco.com)	
84 b2	When was the tool last updated?	< 1 year	V
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year	V
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	n/a	
91	If appropriate, provide any additional information/context to the answers in this section.		
9. PAYME	NT TRANSPARENCY		
92	Does the Entity adhere to the Wolfsberg Group	I	
	Payment Transparency Standards?	Yes	_

	In a rate was a second		
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	, and the second	
93 b1	If Y, specify the regulation	Yes MAMLA, Payment Services and Payment Systems Act, Regulation 2015/847 of the European Parliament and of the Council of 20 May, 2015 on information accompanying transfers of funds and repealing Regulation (EC) No 1781/2006	
93 с	If N, explain		
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes	•
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes	•
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes	•
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
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?	Automated	▼
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?	NetReveal. This system was purchased from Symphony, formerly known as BAE Systems Detic (formerly Norkom Technologies).	ca
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	<1 year	•
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes	•
104	What is the method used by the Entity?	Automated	
-	<u> </u>	and the same of th	

programme to ensure that complete data for all pransactions are subject to an anchous accreening? 106 a Select the Sanctions Lists used by the Entity in its sanctions accreening processes: 106 a Select the Sanctions Lists (LN) 106 b Consolicated United Nations Security Council 107 b United States Department of the Treasury's Office of the Council State State Separate (Trick The Treasury's Office of the Council State State Separate (Trick The Treasury's Office of the Council State State Separate (Trick The Treasury's Office of the Council State State Separate (Trick The Treasury's Office of the Council State State Separate (Trick The Treasury's Office of the Council State State Separate (Trick The Treasury's Office of the Council State State Separate (Trick The Treasury's Office of the Separate (Trick The Trick				
sanctions screening processes: Commonwealth Co	105	programme to ensure that complete data for all	Yes	•
Sanctons List (UN) Were regulatory authorities make updates to their (CFSA) Other (peorly) When regulatory authorities make updates to their Sanchason and the fire and the sanchason and the	106			
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Cores Core	106 b		Used for screening customers and beneficial owners and for filtering transactional data	
Other (specify) Council of Ministers of Republic of Bulgaria List, internal black lists.	106 с	·	Used for screening customers and beneficial owners and for filtering transactional data	•
Other (specify) When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or authorated screening systems against: Sanctions list, how many business days before the entity updates their active manual and/or authorated screening systems against: Transactions Does the Entity flories of physical presence, e.g. Some day to 2 business days Does the Entity flories of physical presence, e.g. OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions 9. To an interest of the entity flories of prosperative contries have enacted comprehensive jurisdiction-based Sanctions 9. The specific provide any additional information/context to the answers in this section. The appropriate, provide any additional information/context to the answers in this section. The appropriate, provide any additional information/context to the answers in this section. The appropriate, provide any additional information/context to the answers in this section. With regard to question 10th our screening is broader than only customers and beneficial owners are secretary and include persons related to the legal entity regardless their capacity (to also detection and provy inclines). The physical provide any additional information/context to the answers in this section. With regard to question 10th our screening is broader than only customers and beneficial owners are secretary and include persons related to the legal entity regardless their capacity (to also detection and provy inclines). The appropriate, provide any additional information/context to the answers in this section. We secreen all natural persons related to the legal entity regardless their capacity (to also detection and provy inclines). The provide and culture in the market, e.g. significant forms of money laundering, berorist financing and sanctions violations relevant for the year of products and culture. The provide and culture in the market, e.g. significant r	106 d	, ,	Used for screening customers and beneficial owners and for filtering transactional data	
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 108 Destructioner Data Same day to 2 business days 107 b Transactions 109 Destructioner Data Same day to 2 business days 107 b Transactions 109 Destructioner Data Same day to 2 business days 107 b Transactions 109 Confirm that all responses provided in CPCS Sociated in ourtries/regions against which IN, OFAC, OFSI, EU or 67 member countries have enacted comprehensive jurisdiction-based Sanctions? 109 Confirm that all responses provided in the above Section are representative of all the LES branches 109 a If N, Clarify which questions the differencels relate to and the branches that this applies to. 109 a If Appropriate, provide any additional information/context to the answers in this section. 110 Been the Entity provide manufactory training, which includes: 111 Describe the Entity provide manufactory training, which includes: 111 A Been the Entity provide manufactory training, which includes: 111 A Been the Entity provide manufactory training which includes: 111 A Been the Entity provide manufactory training which includes: 112 A Beard and Sanctions violations relevant for the types of products and services offered years of the service o	106 e	•	Not used	
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Transactions Same day to 2 business days Image: Application Imag	107	Sanctions list, how many business days before the entity updates their active manual and/or automated		
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Does the Entity provide mandatory training, which includes: It is dentification and reporting of transactions to government authorities	110		as we screen all natural persons related to the legal entity regardless their capacity (so also	ers
includes: Identification and reporting of transactions to government authorities	11. TRAINI	NG & EDUCATION		
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terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Yes Interpolatory actions or new regulatory actions or new regul	111 b	terrorist financing and sanctions violations relevant	Yes	•
regulatory actions or new regulations Yes Interpolation of Defence	111 c		Yes	\blacksquare
In the state of Defence	111 d	, ,	Yes	
Is the above mandatory training provided to: Il 2 a Board and Senior Committee Management Yes Interest Provided to: Il 2 b Ist Line of Defence Yes Interest Provided to: Il 2 c 2nd Line of Defence Yes Interest Provided to State Provided Authority Provided Au	111 e	Conduct and Culture	Yes	
Board and Senior Committee Management 112 b	111 f		Yes	
112 b	112			
112 c 2nd Line of Defence Yes 112 d 3rd Line of Defence Yes 112 e Third parties to which specific FCC activities have been outsourced Yes 112 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? 115 Confirm that all responses provided in the above	112 a			
112 d 3rd Line of Defence Yes 112 e Third parties to which specific FCC activities have been outsourced Yes 112 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? 115 Confirm that all responses provided in the above				
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Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities? Does the Entity provide customised training for AML, CTF and Sanctions staff? If Y, how frequently is training delivered? Annually Confirm that all responses provided in the above	112 f		Yes	
Does the Entity provide customised training for AML, CTF and Sanctions staff? If Y, how frequently is training delivered? Confirm that all responses provided in the above	113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and		—
115 Confirm that all responses provided in the above	114	Does the Entity provide customised training for AML,	Yes	
· · · · · · · · · · · · · · · · · · ·	114 a	If Y, how frequently is training delivered?	Annually	
	115		Yes	

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hird party cover the following areas: 23 a		External Third Party	Component-based reviews
procedures Procedures Proc		third party cover the following areas:	
123 c Governance Yes	123 a		Yes
123 d KYC/CDD/EDD and underlying methodologies Yes		Enterprise Wide Risk Assessment	Yes
Name Screening & List Management Yes			Yes
123 f Reporting/Metrics & Management Information Yes			
123 g Suspicious Activity Filling Yes			
123 h Technology Yes		·	
123 i Transaction Monitoring Yes 123 j Transaction Screening including for sanctions Yes 123 k Training & Education Yes 123 l Other (specify) 124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 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.		, , ,	
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127 Does the Entity have policies in place addressing fraud risk? Yes 128 Does the Entity have a dedicated team responsible	14. FRAU	ID	
		Does the Entity have policies in place addressing	Yes
	128		Yes

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