## the Wolfsberg Group

Financial Institution Name: Location (Country) :

MIDLAND BANK LIMITED BANGLADESH

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.

		<b>\</b>
No#	Question	Answer
	OWNERSHIP	
	Fuli Legal Name	Midland Bank Limited
	Append a list of foreign branches which are covered by this questionnaire	NIL
3	Full Legal (Registered) Address	N.B. Tower (Level 6-9), 40/7 North Avenue, Gulshan-2, Dhaka-1212, Bangladesh.
	Full Primary Business Address (if different from above)	N/A
5	Date of Entity Incorporation/establishment	March 20, 2013
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	Dhaka Stock Exchange and Chiltagong Stock Exchange Ticker Symbol: MIDLANDBNK
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	The Bank Doesn't issue any bearer share
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	Yes
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	At Gulshan Branch, Dhaka & Agrabad Branch, Chattogram
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	Financial Regulator is Bangladesh Bank & AML supervisory authority is Bangladesh Financial Intelligence Unit (BFIU)
11	Provide Legal Entity Identifier (LEI) If available	2549004VYN5Y67AQ9Y79
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	N/A
1		

13		
1	Jurisdiction of licensing authority and regulator of	N/A
	ultimate parent	
	į	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	
14 Б	Private Banking	Yes
14 c		No
	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	
141	Multilateral Development Bank	No
		No
14]	Wealth Management	No
14 k	Other (please explain)	
		Card Business
15	Does the Entity have a significant (10% or more)	
1	portfolio of non-resident customers or does it derive	
	more than 10% of its revenue from non-resident	
1	customers? (Non-resident means customers primarily	No
İ	resident in a different jurisdiction to the location	<b>1</b> ····
1	where bank services are provided)	
	1	
15 a	If Y, provide the top five countries where the non-	
l	resident customers are located.	N/A
ĺ		
1		
Ĺ		
16	Select the closest value:	
16 a	Number of employees	FOLLORS
16 b	Total Assets	501-1000
17		Between \$100 and \$500 million
	Confirm that all responses provided in the above	Yes
	Section are representative of all the LE's branches.	168
17 a	If N, clarify which questions the difference/s relate to	
i	and the branch/es that this applies to.	N/A
i		
i	1	
		<b>!</b>
	<u> </u>	<b>!</b>
18	If appropriate, provide any additional	
18	If appropriate, provide any additional information/context to the answers in this section	N/A
18	If appropriate, provide any additional information/context to the answers in this section.	N/A
18		N/A
	information/context to the answers in this section.	N/A
	information/context to the answers in this section.	N/A
2. PRODU	information/context to the answers in this section.  JCTS & SERVICES	N/A
	information/context to the answers in this section.  JCTS & SERVICES  Does the Entity offer the following products and	N/A
2. PRODU 19	information/context to the answers in this section.  JCTS & SERVICES  Does the Entity offer the following products and services:	N/A
2. PRODU 19	information/context to the answers in this section.  JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking	N/A  No
2. PRODU 19	information/context to the answers in this section.  JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y	
2. PRODU 19	information/context to the answers in this section.  JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y	
2. PRODU 19 19 a 19 a1	information/context to the answers in this section.  JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking	
2. PROBU 19 19 a 19 a 19 a1 19 a1a	information/context to the answers in this section.  JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?	No
2. PRODU 19 19 a 19 a1	information/context to the answers in this section.  JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to	No No
2. PRODU 19 19 a 19 a1 19 a1a 19 a1b	information/context to the answers in this section.  JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y.  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?	No
2. PROBU 19 19 a 19 a 19 a1 19 a1a	information/context to the answers in this section.  JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures.	No No
2. PRODU 19 19 a 19 a1 19 a1a 19 a1b	information/context to the answers in this section.  JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures.	No No No
2. PRODU 19 19 a 19 a1 19 a1a 19 a1b	information/context to the answers in this section.  JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y.  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?	No No
2. PRODU 19 19 a 19 a1 19 a1a 19 a1b	information/context to the answers in this section.  JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	No No No
2. PRODU 19 19 a 19 a1 19 a1a 19 a1b	information/context to the answers in this section.  JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y:  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking	No No No
2. PRODU 19 19 a 19 a 19 a 19 a 19 a 10 19 a 10 19 a 10 19 a 10	information/context to the answers in this section.  JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?	No No No Yes
2. PRODU 19 19 a 19 a1 19 a1a 19 a1b	information/context to the answers in this section.  JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?	No No No No No No No Yes
2. PRODU 19 19 a 19 a 19 a 19 a 19 a 10 19 a 10 19 a 10 19 a 10	information/context to the answers in this section.  JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y:  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking	No No No Yes
2. PRODU 19 19 a 19 a 19 a 19 a 19 a 10 19 a 10 19 a 10 19 a 10	information/context to the answers in this section.  JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?	No No No No No No No Yes
2. PRODU 19 19 a 19 a 19 a 19 a 10 a 10 a 10 a 10 a 10 a 10 a 10 a 10	JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y.  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?	No
2. PRODU 19 19 a 19 a 19 a 19 a 10 a 10 a 10 a 10 a 10 a 10 a 10 a 10	JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y.  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?	No No No No No No No Yes
2. PRODU 19 a 19 a1 19 a1 19 a1a 19 a1b 19 a1c	JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?	No
2. PRODU 19 19 a 19 a 19 a 19 a 10 a 10 a 10 a 10 a 10 a 10 a 10 a 10	information/context to the answers in this section.  JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity forer Correspondent Banking services to fentity foreign banks?	No No No Yes No Yes
2. PRODU 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d	information/context to the answers in this section.  JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y.  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	No No No No No No No Yes No
2. PRODU 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d	information/context to the answers in this section.  JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y.  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	No No No Yes No Yes
2. PRODU 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f	information/context to the answers in this section.  JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y.  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	No No No Yes No Yes
2. PRODU 19 19 a 19 a 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d	JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity forer Correspondent Banking services to foreign banks?  Does the Entity forer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTss)?  Does the Entity allow downstream relationships	No No No Yes No Yes
2. PRODU 19 19 a 19 a 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d	JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity for Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	No No No Yes No Yes
2. PRODU 19 19 a 19 a 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d	JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity forer Correspondent Banking services to foreign banks?  Does the Entity forer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTss)?  Does the Entity allow downstream relationships	No No No Yes No Yes
2. PRODU 19 19 a 19 a 19 a 19 a 16 19 a 16 19 a 16 19 a 16 19 a 17 19 a 18 19 a 19 19 19 19 19 19 19 19	JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity forer Correspondent Banking services to dentify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	No No No No Yes No No No
2. PRODU 19 19 a 19 a 19 a 19 a 10	JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	No No No Yes No No No No No No
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9 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MS8s /MVTSs/PSPs?	Yes
9 b		No
9 C	Cross-Border Remittances	Yes
9 d	Domestic Bulk Cash Delivery	No
9 e	Hold Mail	No
9 f	International Cash Letter	No
9 g	Low Price Securities	No
9 h	Payable Through Accounts	No
91	Payment services to non-bank entities who may then offer third party payment services to their customers?	No
9 11	If Y , please select all that apply below?	
9 i2	Third Party Payment Service Providers	Please select
9 i3	Virtual Asset Service Providers (VASPs)	Please select
9 i4	eCommerce Platforms	Please select
9 15	Other - Please explain	
9 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No .
9 I	Sponsoring Private ATMs	No .
19 m	Stored Value Instruments	No .
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	Yes
19 p1a	If yes, state the applicable level of due diligence	Due diligense
19 p2	Wire transfers	Yes
19 p2a	If yes, state the applicable level of due diligence	Due diligence
19 p3	Foreign currency conversion	Yes
19 p3a	If yes, state the applicable level of due diligence	Due diligence Yes
19 p4	Sale of Monetary Instruments  If yes, state the applicable level of due diligence	Pue difigence
19 p4a 19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	Foreign Inward Remittance Delivery and Local RTGS remittances on due-diligence and verification of identification and sources of fund
19 q	Other high-risk products and services identified by the Entity (please specify)	N/A, MDB does not provide any additional High Risk Products
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
21	If appropriate, provide any additional information/context to the answers in this section.	N/A
3. AML.	CTF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimun AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	e Yes
22 b	Adverse Information Screening	Yes
22 C	Beneficial Ownership	Yes
22 d	Cash Reporting	Yes
22 e	CDD	Yes
22 f	EDD	Yes
22 g	Independent Testing	Yes
22 h	Periodic Review	Yes
22	Policies and Procedures	Yes
	PEP Screening	Yes
22	I I Li Colocining	
22 j 22 k	Risk Assessment	Yes



22 m	Suspicious Activity Reporting	V
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	1-10
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.	
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	N/A
27	Does the entity have a whistleblower policy?	V
28	Confirm that all responses provided in the above	Yes
	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.	D N/A
29	If appropriate, provide any additional information/context to the answers in this section.	AML & CFT Policies Guidelines are reviewed and approved by the Board of Directors in every two years, and reviewed if any changes are made by the Regulators or BFtU.
4. ANTI	PRIDERY CORRUPTION	
4. ANTI	BRIBERY & CORRUPTION  Has the Entity documented policies and procedures	
00	consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	Sout bour Adutrales and mand barnes schild ou paulan of the Fullity
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	N/A
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	V



49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes	
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes	
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes	
49 e	services to shell banks	Yes	
49 d	Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides	Yes	
9 с	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes	·. ·
19 b	Prohibit the opening and keeping of accounts for unlicensed banks and for NBFIs	Yes	
19 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes	
19	Does the Entity have policies and procedures that:		
18 b1	If Y, does the Entity retain a record of the results?	Yes	
8 a1	If Y, does the Entity retain a record of the results?	Yes Yes	: <u> </u>
8 a	U.S. Standards	Yes	
	Has the Entity chosen to compare its policies and procedures against:		
	Are the Entity's policies and procedures updated at least annually?	No ·	
16 c	Sanctions violations	Yes	
16 b	Terrorist financing	Yes	
	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:  Money laundering	Yes	SPECIAL SPECIA
6	Has the Entity documented policies and procedures		
	information/context to the answers in this section.  F & SANCTIONS POLICIES & PROCEDURES	N/A	
15	and the branch/es that this applies to.  If appropriate, provide any additional	N/A	
4 a	Section are representative of all the LE's branches  If N, clarify which questions the difference/s relate to	Yes	
Į.	o specific roles, responsibilities and activities?  Confirm that all responses provided in the above	Yes	
2 f	Non-employed workers as appropriate (contractors/consultants)  Does the Entity provide ABC training that is targeted	Not Applicable	
2 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	No	
2 d	3rd Line of Defence	Yes	
2 c	2nd Line of Defence	Yes	
2 b	1st Line of Defence	Yes	
2 a	Board and senior Committee Management	Yes	
P	ndependent third party cover ABC Policies and Procedures?  Incest the Entity provide mandatory ABC training to:	Yes	
	increase the Entity's corruption risk toes the Entity's Internal audit function or other		
	and political contributions  Changes in husiness activities that may materially	Yes	
d	or public officials  Corruption risks associated with gifts and	Yes	
c	or through intermediaries  Transactions, products or services, including those that involve state-owned or state-controlled entities		
		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 1		
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.	N/A
53	If appropriate, provide any additional information/context to the answers in this section.	N/A
		The contract of the contract o
6. AML, CTF	& SANCTIONS RISK ASSESSMENT	
	Does the Entity's AML & CTF EWRA cover the	
6. AML, CTF	Does the Entity's AML & CTF EWRA cover the Inherent risk components detailed below:	
6. AML, CTF 54	Does the Entity's AML & CTF EWRA cover the	Yes
6. AML, CTF 54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes Yas
6.AMU CTF 54 54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product	Yes Yes Yes Yes
6. AMU CTF 54 54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the Inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the	Yes Yas
6. AML, CTr 54 54 a 54 b 54 c 54 d 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel	Yes Yes Yes Yes
6. AML, CTr 54 54 a 54 b 54 c 54 d 55 d 55 a	Does the Entity's AML & CTF EWRA cover the Inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes Yes Yes Yes
54 a 54 b 55 d d 55 d d 55 5 a 55 b	Does the Entity's AML & CTF EWRA cover the Inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes Yes Yes Yes Yes Yes
6. AML CTE 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c	Does the Entity's AML & CTF EWRA cover the Inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes Yes Yes Yes Yes
6. AMU CTE 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	Yes Yes Yes Yes Yes Yes Yes
6. AML CTE 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c	Does the Entity's AML & CTF EWRA cover the Inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes Yes Yes Yes Yes Yes Yes Yes Yes
6. AML CTF 54 54 a 54 b 54 c 54 d 55 55 55 a 55 b 55 c 55 d 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative	Yes
54 a 54 b 54 c 54 d 55 d 55 d 55 c 55 d 55 c 55 f	Does the Entity's AML & CTF EWRA cover the Inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes
54 a 54 b 55 c 55 b 55 c 55 d 55 g 55 h	Does the Entity's AML & CTF EWRA cover the Inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	Yes
54 a 54 b 54 c 55 d 55 a 55 b 55 c 55 d 55 c 55 f 55 g	Does the Entity's AML & CTF EWRA cover the Inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes
54 a 54 b 54 c 54 d 55 d 55 a 55 b 55 c 55 d 55 c 55 d 55 f 55 g 55 h	Does the Entity's AML & CTF EWRA cover the Inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed	Yes
54 a 54 b 54 c 54 d 55 c 55 d 55 d	Does the Entity's AML & CTF EWRA cover the Inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.	Yes
54 a 54 b 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 d 55 d	Does the Entity's AML & CTF EWRA cover the Inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
6. AML CTE 54 a 54 b 54 c 54 d 55 d 55 b 55 c 55 d 55 c 55 d 55 g 55 h 56 a	Does the Entity's AML & CTF EWRA cover the Inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
6. AML CTE 54 a 54 b 54 c 54 d 55 c 55 b 55 c 55 c 55 d 55 c 55 d 55 f 55 g 55 h 56 a	Does the Entity's AML & CTF EWRA cover the Inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the Inherent risk components detailed below: Client	Yes
54 a 54 a 54 b 554 c 554 c 554 c 555 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the Inherent risk components detailed below:  Client Product Channel Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News  Training and Education  Governance  Management Information  Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the Inherent risk components detailed below:  Client  Product  Channel	Yes
54 a 54 b 54 c 55 d 55 c 55 c 55 c 55 c 55 c 55 c	Does the Entity's AML & CTF EWRA cover the Inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the Inherent risk components detailed below: Client Product Channel Geography	Yes
54 a 554 b 554 c 554 d 555 c 555 c 555 c 555 c 555 d 556 c 557 c 57 a 577 c 577 d 58	Does the Entity's AML & CTF EWRA cover the Inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the Inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
6. AML CTE 54 a 54 a 54 b 54 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 d 56 a	Does the Entity's AML & CTF EWRA cover the Inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  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
54 a 54 b 54 c 55 b 55 c 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the Inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes
54 a 54 b 54 c 54 d 55 55 c 55 d 55 c 55 d 55 f 56 6 56 a 57 57 b 57 a 57 b 57 b 57 b 57 b 57 b	Does the Entity's AML & CTF EWRA cover the Inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes





B e	Name Screening	Yes
B f	Transaction Screening	Yes
Bg	Training and Education	Yes
9	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
9 a	If N, provide the date when the last Sanctions EWRA was completed.	N/A
0	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
0 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
1	If appropriate, provide any additional information/context to the answers in this section.	N/A
, KYC, C	DD and EDD	
2	Does the Entity verify the identity of the customer?	Yes
33	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
34 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:	N
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes Yes
65 b	Authorised signatories (where applicable)	Yes
65 с	Key controllers	Yes
65 d 66	Other relevant parties  What is the Entity's minimum (towest) threshold applied to beneficial ownership identification?	20%
67	Does the due diligence process result in customers receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	Transaction amount, Monthly Income, Delivery Channel, Country Jurisdictions, Regulatory Risk etc.
68	For high risk non-individual customers, is a site visit part of your KYC process?	a Yes
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4 68 a4a	Other If yes, please specify "Other"	Yes Irregular visit on random selection basis
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:	Ves
69 a1		103
69 a2	KYC renewal	Yes

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69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	Yes
71	Adverse Media/Negative News?  Does the Entity have a risk based approach to screening	Combination of automated and manual
	customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
71 a	If Y, is this at:	
71 a1 71 a2	Onboarding	Yes
71 a2 71 a3	KYC renewal Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Yes
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?	Combination of automated and manual 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 74 a4	3 – 4 years	Yes
74 a4 74 a5	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes
	Olher (Please specify)	N/A
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
70	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Prohibited
76 b	Respondent Banks	EDD on risk-based approach
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	Always subject to EDD
76 d	Extractive industries	Prohibited
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	EDD on risk-based approach
76 i	Non-account customers	EDD on risk-based approach
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	EDO on risk-based approach
761	Nuclear power	Prohibited
76 m	Payment Service Providers	EDO on risk-based approach
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	Prohibited
76 r	Red light businesses/Adult entertainment	Prohibited
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	EOD on risk-based approach
76 v	Unregulated charities	Prohibited
76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers	Prohibited
76 y	Other (specify)	N/A
77	It	
77	If restricted, provide details of the restriction	N/A
78	Does EDD require senior business management and/	
	or compliance approval?	Yes



а	If Y indicate who provides the approval:	Compliance
10	Does the Entity have specific procedures for onboarding entities that handle client money such as awyers, accountants, consultants, real estate agents?	Yes
) [	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
1	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
la	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	N/A
2	If appropriate, provide any additional information/context to the answers in this section.	N/A
. MONITO	RING & REPORTING	
3	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
4	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
14 a	If manual or combination selected, specify what type of transactions are monitored manually	After getting reports automatically, we review manually exception reports, structuring reports and CTR qualified account & transaction and Adverse news from Media.
34 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Vendor-sourced tools
34 Б1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	Flora Telecom, Acuity Online
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 Control of the Co
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entitles in a limely 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 t and the branch/es that this applies to	N/A
91	If appropriate, provide any additional information/context to the answers in this section.	N/A
0 BANG	ENT TRANSPARENCY	
9. PAYMI 92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes



93	Does the Entity have policies, procedures and	
- "	processes to comply with and have controls in place	
	to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	Money Laundering Prevention Act-2012 and Amendment Act-2015.     Anli Terrorism Act-2009 Amendment Act-2013     Money Laundering Rules -2019 and     Bangladesh Financial Intelligence Unit (BFIU) Circular -26 dated 16th June 2020.
93 c	If N, explain	N/A
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.	N/A
97	If appropriate, provide any additional information/context to the answers in this section.	N/A
10. SANO	TIONS	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Both Automated and Manual
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Both
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Flora Telecom, Acuity Online
102 a2	When did you last lest 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)	1-2 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?  What is the method used by the Entity?	Yes
104		



105	Does the Entity have a data quality management programme to ensure that complete data for all	v.
	transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its	
106	sanctions screening processes:	
106 a	Consolidated United Nations Security Council	
	Sanctions List (UN)	Used for screening customers and beneficial owners (i.e. reference data)
106 b	United States Department of the Treasury's Office of	Used for screening customers and beneficial owners (i.e. reference data)
	Foreign Assets Control (OFAC)	Used for screening dustomers and beneficial owners (i.e. relevance data)
106 c	Office of Financial Sanctions Implementation HMT	Used for screening customers and beneficial owners (i.e. reference data)
	(OFSI)	
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners (i.e. reference data)
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners (i.e. reference data)
106 f	Other (specify)	List of local Regulator, if any
107	When regulatory authorities make updates to their	
	Sanctions list, how many business days before the	
	entity updates their active manual and/or automated	
	screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g.	
	branches, subsidiaries, or representative offices	No.
	located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted	No
	comprehensive jurisdiction-based Sanctions?	
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	N/A
	and the branch/es that this applies to.	1,44
	Citio and promote event and albuman	
110	If appropriate, provide any additional	N/A
110		N/A
110	If appropriate, provide any additional information/context to the answers in this section.	N/A
	If appropriate, provide any additional information/context to the answers in this section.	
11. TRAIN	If appropriate, provide any additional information/context to the answers in this section.	N/A
	If appropriate, provide any additional information/context to the answers in this section.  ING & EDUCATION  Does the Entity provide mandatory training, which	
11.TRAIN 111	If appropriate, provide any additional information/context to the answers in this section.  ING & EDUCATION  Does the Entity provide mandatory training, which includes:	
11. TRAIN	If appropriate, provide any additional information/context to the answers in this section.  ING & EDUCATION  Does the Entity provide mandatory training, which	
11.TRAIN 111	If appropriate, provide any additional information/context to the answers in this section.  ING & EDUCATION  Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to	
11, TRAIN 1111 1111 a	If appropriate, provide any additional information/context to the answers in this section.  ING & EDUCATION  Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant	Yes
11, TRAIN 1111 1111 a	If appropriate, provide any additional information/context to the answers in this section.  ING & EDUCATION  Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering,	
11, TRAIN 1111 1111 a	If appropriate, provide any additional information/context to the answers in this section.  ING & EDUCATION  Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
11, TRAIN 1111 1111 a	If appropriate, provide any additional information/context to the answers in this section.  ING & EDUCATION  Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering,	Yes
11, TRAIN 111 111 a 111 b	If appropriate, provide any additional information/context to the answers in this section.  ING & EDUCATION  Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes Yes Yes
11, TRAIN 1111 1111 a	If appropriate, provide any additional information/context to the answers in this section.  ING & EDUCATION  Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant	Yes Yes Yes
19. TRAIN 111 111 a 111 b 111 c	If appropriate, provide any additional information/context to the answers in this section.  ING & EDUCATION  Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes Yes Yes Yes
11. TRAIN 1111 1111 a 1111 b 1111 c 1111 d	If appropriate, provide any additional information/context to the answers in this section.  ING & EDUCATION  Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture	Yes Yes Yes Yes Yes Yes Yes
11, TRAIN 1111 1111 a 1111 c 1111 d 1111 e 1111 f	If appropriate, provide any additional information/context to the answers in this section.  ING & EDUCATION  Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations retevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud	Yes Yes Yes Yes
11, TRAIN 1111 1111 a 1111 b 1111 c 1111 d 1111 e 1111 f 1112	If appropriate, provide any additional information/context to the answers in this section.  ING & EDUCATION  Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations retevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:	Yes Yes Yes Yes Yes Yes Yes
11, TRAIN 1111 1111 a 1111 c 1111 d 1111 e 1111 f	If appropriate, provide any additional information/context to the answers in this section.  ING & EDUCATION  Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations retevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud	Yes Yes Yes Yes Yes Yes Yes Yes
11, TRAIN 111 111 a 111 b 111 c 111 d 111 e 111 f 112 112 a	If appropriate, provide any additional information/context to the answers in this section.  ING & EDUCATION  Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations retevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management	Yes  Yes  Yes  Yes  Yes  Yes  Yes  Yes
11. TRAIN 111 111 a 111 b 111 c 111 d 111 e 111 f 112 112 a 112 b	If appropriate, provide any additional information/context to the answers in this section.  ING & EDUCATION  Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence	Yes  Yes  Yes  Yes  Yes  Yes  Yes  Yes
11. TRAIN 111 111 a 111 b 111 c 111 d 111 e 111 f 112 112 a 112 b 112 c	If appropriate, provide any additional information/context to the answers in this section.  ING & EDUCATION  Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  Third parties to which specific FCC activities have	Yes
11. TRAIN 1111 1111 a 1111 b 1111 c 1111 d 1111 e 1111 f 1112 1112 a 1112 b 1112 c 1112 d 1112 d	If appropriate, provide any additional information/context to the answers in this section.  ING & EDUCATION  Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  Third parties to which specific FCC activities have been outsourced	Yes  Yes  Yes  Yes  Yes  Yes  Yes  Yes
11. TRAIN 1111 1111 a 1111 b 1111 c 1111 d 1111 f 1112 i 112 a 112 b 112 c 112 d 112 c	If appropriate, provide any additional information/context to the answers in this section.  ING & EDUCATION  Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations retevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  Third parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants)	Yes  Yes  Yes  Yes  Yes  Yes  Yes  Yes
11. TRAIN 1111 1111 a 1111 b 1111 c 1111 d 1111 e 1111 f 1112 1112 a 1112 b 1112 c 1112 d 1112 d	If appropriate, provide any additional information/context to the answers in this section.  ING & EDUCATION  Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations retevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  Third parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants)  Does the Entity provide AML, CTF & Sanctions trainic	Yes  Yes  Yes  Yes  Yes  Yes  Yes  Yes
11. TRAIN 1111 1111 a 1111 b 1111 c 1111 d 1111 f 1112 i 112 a 112 b 112 c 112 d 112 c	If appropriate, provide any additional information/context to the answers in this section.  ING & EDUCATION  Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants)  Does the Entity provide AML, CTF & Sanctions trainit that is targeted to specific roles, responsibilities and	Yes  Yes  Yes  Yes  Yes  Yes  Yes  Yes
11, TRAIN 111 111 a 111 b 111 c 111 d 111 e 111 f 112 i 112 a 112 b 112 c 112 d 112 e 112 f 113	If appropriate, provide any additional information/context to the answers in this section.  ING & EDUCATION  Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  Third parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants)  Does the Entity provide AML, CTF & Sanctions trainit that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Yes  Yes  Yes  Yes  Yes  Yes  Yes  Yes
11. TRAIN 1111 1111 a 1111 b 1111 c 1111 d 1111 f 1112 i 112 a 112 b 112 c 112 d 112 c	If appropriate, provide any additional information/context to the answers in this section.  ING & EDUCATION  Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants)  Does the Entity provide AML, CTF & Sanctions trainit that is targeted to specific roles, responsibilities and	Yes  Yes  Yes  Yes  Yes  Yes  Yes  Yes
11. TRAIN 1111 1111 a 1111 b 1111 c 1111 d 1111 c 1112 c 1112 b 1112 c 112 d 112 c 112 d 112 d	If appropriate, provide any additional information/context to the answers in this section.  ING & EDUCATION  Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants)  Does the Entity provide AML, CTF & Sanctions trainit that is targeted to specific rotes, responsibilities and high-risk products, services and activities?  Does the Entity provide customised training for AML,	Yes  Yes  Yes  Yes  Yes  Yes  Yes  Yes
11, TRAIN 111 111 a 111 b 111 c 111 d 111 e 111 f 112 i 112 a 112 b 112 c 112 d 112 e 112 f 113	If appropriate, provide any additional information/context to the answers in this section.  ING & EDUCATION  Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants)  Does the Entity provide AML, CTF & Sanctions trainit that is targeted to specific rotes, responsibilities and high-risk products, services and activities?  Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes  Yes  Yes  Yes  Yes  Yes  Yes  Yes



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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.  127 Does the Entity have policies in place addressing			
Information/context to the answers in this section.   NA	115 a		N/A
12. QUALITY ASSURANCE COMPLIANCE YESTING  17. Does the Entity have a grogram wide risk based Caulaly Assurance programs to financial crime (apparate from the Independent Audit Inaction)?  18. Does the Entity have a program wide risk based Compliance Testing process (separate from the Independent Audit Inaction)?  19. Conferm that all responses provided in the above Section are representative of all the LES tranches of the Conferm that all responses provided in the above Section are representative of all the LES tranches of the Conferm that all responses to differences's relate to and the branchise that the applies to.  19. If appropriate, provide any additional information/bonks to the answers in this section.  19. AMJ. CTF, ARC, Fraud and Sanctions policies and practices on a regular beside.  19. AMJ. CTF, ARC, Fraud and Sanctions policies and practices on a regular beside.  19. AMJ. CTF, ARC, Fraud and Sanctions policies and practices on a regular beside.  19. AMJ. CTF, ARC, Fraud and Sanctions policies and practices on a regular beside?  19. AMJ. CTF, ARC, Fraud and Sanctions policies and practices on a regular beside?  19. AMJ. CTF, ARC, Fraud and Sanctions policies and practices on a regular beside?  19. AMJ. CTF, ARC, Fraud and Sanctions policies and practices on a regular beside?  19. AMJ. CTF, ARC, Fraud and Sanctions policy and procedures  19. AMJ. CTF, ARC, Fraud and Sanctions policy and procedures  19. AMJ. CTF, ARC, Fraud and Sanctions policy and procedures  19. AMJ. CTF, ARC, Fraud and Sanctions policy and procedures  19. AMJ. CTF, ARC, Fraud and Sanctions policy and procedures  19. AMJ. CTF, ARC, Fraud and Sanctions policy and procedures  19. AMJ. CTF, CF, CF, CF, CF, CF, CF, CF, CF, CF, C			
117 Does the Entity have a program wide risk based Caully Assarance programs for famalical crime (separate from the independent Audit function?)?  118 Does the Entity have a program wide risk based Compliance Tealing process (separate from the independent Audit function?)?  119 Confirm that all responses provided in the above Section are representative of all the LES branches Section are representative of all the LES branches  119 a If N, durity which questions the difference fraction information function and the branchists that his applies to.  110 If appropriate, provide any additional information for large and the provided any additional information for large provided any additional information for large provided and the provided and audit function, a lesting function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sencions policies and practices on a regular basis?  122 How from is the Entity audited on its AML, CTF, ABC, Fraud and Sencions programme by the following:  123 Destinated Audit Department Vasary  124 External Third Party Vasary  125 External Third Party Vasary  126 Destination of the internal audit function or other independent third party cover the following stress:  123 A MAC, CTF, ABC, Fraud and Sencions policy and procedures  124 Destination of the internal audit function or other independent third party cover the following stress:  125 Destination of the internal audit function or other independent third party cover the following stress:  126 Destination of the internal audit function or other independent third party cover the following stress:  127 Ownermance  128 Destination of the internal audit function or other independent third party cover the following stress:  129 Destination of the Entity Senate o	116		N/A
117 Does the Entity have a program wide risk based Caully Assarance programs for famalical crime (separate from the independent Audit function?)?  118 Does the Entity have a program wide risk based Compliance Tealing process (separate from the independent Audit function?)?  119 Confirm that all responses provided in the above Section are representative of all the LES branches Section are representative of all the LES branches  119 a If N, durity which questions the difference fraction information function and the branchists that his applies to.  110 If appropriate, provide any additional information for large and the provided any additional information for large provided any additional information for large provided and the provided and audit function, a lesting function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sencions policies and practices on a regular basis?  122 How from is the Entity audited on its AML, CTF, ABC, Fraud and Sencions programme by the following:  123 Destinated Audit Department Vasary  124 External Third Party Vasary  125 External Third Party Vasary  126 Destination of the internal audit function or other independent third party cover the following stress:  123 A MAC, CTF, ABC, Fraud and Sencions policy and procedures  124 Destination of the internal audit function or other independent third party cover the following stress:  125 Destination of the internal audit function or other independent third party cover the following stress:  126 Destination of the internal audit function or other independent third party cover the following stress:  127 Ownermance  128 Destination of the internal audit function or other independent third party cover the following stress:  129 Destination of the Entity Senate o			
Quality Assurance programme for insuncial orine (separate form the independent Audit function)?  118			
Compliance Testing process (separate from the independent Audit transciority)  119 a Confirm that all responses provided in the above Section are prosenative of all the LEP branches  119 a Iff, Carliy which questions the difference's relate to and the branches that this applies to.  119 a Iff, Carliy which questions the difference's relate to and the branches that this applies to.  120 If appropriate, provide any additional information/context to the answers in this anction.  13. AUDIT  121 In addition to inspections by the government supervisoring training to does the first have an internal audit function, a testing function or other independent third party or both, that assessant CCC AMB., CTP, ARC, fraced and Sanctions pollodes and procedure on a regular healt?  122 How often is the Entity audited on its AMI, CTP, ABC, Fraud and Sanctions programme by the following:  123 a Internal Audit function or other independent third party cover the following areas:  124 a Internal Audit function or other independent third party cover the following areas:  125 a Confirm that and the function or other independent third party cover the following areas:  126 a Conversance  127 a Reporting/field St. Assessment  128 Confirm that and the function or other independent third party cover the following areas:  128 a Name Screening & List Minargement  129 Supplicious Activity Fing  129 Transaction Screening Including for sanctions  129 Transaction Screening Including for sanctions  129 Transaction Screening Including for sanctions  129 Transaction Screening Including from internal & certanal audit tracked to completion and assessed for adequacy  120 Confirm that all responses to the difference's relate to and the barry and completions and assessed for adequacy  129 Transaction Monitoring  120 Confirm that all responses to the difference's relate to and the barry and completions and assessed for adequacy  120 Confirm that all responses to the difference's relate to any development and completions and assessed for adequacy  120 Con		Quality Assurance programme for financial crime	Yes
Section are representative of all the LE's branches  If N, Lostify which questions the difference/s relate to and the branchies that this applies to and the branchies that this applies to make the property of the property	118	Compliance Testing process (separate from the	Yes
and the branchles that this applies to,  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.	119		Yes
information/context to the answers in this section.  13. AUDIT  13. In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Trans and Sanctions policies and practices or a regular beals?  122. How drie is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:  122. External Thirty audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:  123. Does the internal audit Department  124. External Thirty appropriate and the party Yesn'y  125. External Thirty and the party  126. External Thirty and the party  127. Yesn'y  Yesn'	119 a		N/A
In addition to Inspections by the government supervisors/regulators, does the Fally have an internal audit function, a testing function or other independent third party or both, that assesses FCC AML, CTF, ABC, Fraud and Sunctions policies and practices on a regular beals?   Yes	120	If appropriate, provide any additional information/context to the answers in this section.	N/A
In addition to inspections by the government supervisors/regulators, does the Fitty have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?  122 How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:  123 Internal Audit Department  124 External Third Parry  125 Dess the internal audit tunction or other independent third party cover the following reas:  126 Internal Audit Department  127 External Third Parry  128 Desserved the following reas:  129 Internal Audit Department  129 Covernance  120 Covernance  121 Covernance  122 Covernance  123 Covernance  123 Covernance  124 Covernance  125 Covernance  126 Covernance  127 Covernance  128 Suspicious Audityly Filing  129 Suspicious Audityly Filing  129 Suspicious Audityly Filing  120 Transaction Monitoring  121 Transaction Monitoring  122 Transaction Monitoring  123 Transaction Screening Including for sanctions  124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completioness?  125 Confirm that all responses provided in the above section are representative of all the LE for sanches  126 If appropriate, provide any additional information (Information) (All Final December 1) (All	13. AUDIT		
Fraud and Sanctions programme by the following:  122 b Internal Audit Department  122 b External Third Party  Coes the Internal audit function or other Independent third party cover the following areas:  123 a AML, CTF, ABC, Fraud and Sanctions policy and procedures  123 b Enterprise Wide Risk Assessment  123 c Governance  123 d KYC/CDD/EDD and underlying methodologies  123 e Name Screening & List Management  Yes  123 f Reporting/Metrics & Management Information  123 g Suspicious Activity Filling  123 h Technology  Yes  123 h Transaction Screening including for sanctions  124 h Transaction Screening including for sanctions  125 h Transaction and assessed for adequacy and completeness?  126 Confirm that all responses provided in the above section are representative of all the LE's branches  125 a If appropriate, provide any additional information/context to the answers in this section.  N/A  14. FRAUD  100 Dos the Entity have policies in place addressing  127 Oos the Entity have policies in place addressing	121	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
Teach   Pearly   Pe		How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
Does the internal audit function or other independent third party cover the following areas:  AMIL, CTF, ABC, Fraud and Sanctions policy and procedures  Yes  AMIL, CTF, ABC, Fraud and Sanctions policy and procedures  Yes  Covernance  Yes  Covernance  Yes  123 d KYC/C/DD/EDD and underlying methodologies Yes  123 e Name Screening & List Management Yes  123 f Reporting/Metrics & Management formation Yes  123 g Suspicious Activity Filling Yes  123 h Technology Yes  123 i Transaction Monitoring Yes  123 j Transaction Screening including for sanctions Yes  124 Training & Education Yes  125 other (specify)  Independent Testing Procedure (TTP) conducted by Internal Audit as well as by AMI. Divis  Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completion and assessed for adeq		·	Yearly
third party cover the following areas:    23 a			Yearly
AML, CTF, ABC, Fraud and Sanctions policy and procedures   Yes	123	Does the internal audit function or other independent third party cover the following areas:	
123 d KYCRDD/EDD and underlying methodologies 123 d KYCRDD/EDD and underlying methodologies 123 f Name Screening & List Management 123 f Reporting/Metrics & Management Information 123 g Suspicious Activity Filing 123 h Technology 123 h Technology 123 i Transaction Monitoring 123 j Transaction Monitoring 123 j Transaction Screening including for sanctions 123 k Training & Education 123 l Other (specify) 124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completion and assessed for adequacy and completion are representative of all the LE's branches 125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  127 Does the Entity have policies in place addressing	123 a	AML, CTF, ABC, Fraud and Sanctions policy and	Yes
123 d KYC/CDD/EDD and underlying methodologies Yes  123 d Name Screening & List Management Yes  123 f Reporting/Metrics & Management Information Yes  123 g Suspicious Activity Filing Yes  123 h Technology Yes  123 l Transaction Monitoring Yes  123 l Transaction Screening including for sanctions Yes  123 l Transaction Screening including for sanctions Yes  123 l Transaction Screening including for sanctions Yes  123 l Other (specify) Independent Testing Procedure (iTP) conducted by Internal Audit as well as by AMI. Divis  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  126 If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  127 If appropriate, provide any additional information/context to the answers in this section.  128 If appropriate, provide any additional information/context to the answers in this section.  129 If appropriate, provide any additional information/context to the answers in this section.	123 b	Enterprise Wide Risk Assessment	Yes
123 e Name Screening & List Management Yes  123 f Reporting/Metrics & Management Information 123 g Suspicious Activity Filing Yes  123 h Technology Yes  123 i Transaction Monitoring Yes  123 j Transaction Screening including for sanctions 123 k Training & Education Yes  123 l Other (specify) Independent Testing Procedure (ITP) conducted by Internal Audit as well as by AML Divis  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  126 If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  127 If appropriate, provide any additional information/context to the answers in this section.  128 FRAUD  129 Ooss the Entity have policies in place addressing		Governance	Yes
123 f Reporting/Metrics & Management Information 123 g Suspicious Activity Filing 123 h Technology 123 h Technology 123 j Transaction Monitoring 123 j Transaction Screening including for sanctions 123 j Transaction Screening including for sanctions 123 k Training & Education 124 Cither (specify) 125 lndependent Testing Procedure (iTP) conducted by Internal Audit as well as by AML. Divis 126 Confirm that all responses provided in the above section are representative of all the LE's branches 127 lf appropriate, provide any additional information/context to the answers in this section. 128 If appropriate, provide any additional information/context to the answers in this section. 129 Does the Entity have policies in place addressing			Yes
123 g Suspicious Activity Filing Yes 123 h Technology Yes 123 i Transaction Monitoring Yes 123 i Transaction Screening including for sanctions Yes 123 k Training & Education Yes 123 l Other (specify) Independent Testing Procedure (ITP) conducted by Internal Audit as well as by AML Divis 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 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  127 Does the Entity have policies in place addressing			
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) Independent Testing Procedure (iTP) conducted by Internal Audit as well as by AML Divis 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 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  127 Does the Entity have policies in place addressing			·····
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123 j Transaction Screening including for sanctions 123 k Training & Education 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  126 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.  127 Does the Entity have policies in place addressing			<u></u>
123 k Training & Education Yes  123 l Other (specify) Independent Testing Procedure (ITP) conducted by Internal Audit as well as by AML Divis  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.  13. FRAUD  14. FRAUD  17. Does the Entity have policies in place addressing	123 j		
Independent Testing Procedure (ITP) conducted by Internal Audit as well as by AMIL Divis  Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  Confirm that all responses provided in the above section are representative of all the LE's branches  If N, clarify which questions the difference is relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  N/A  14, FRAUD  Does the Entity have policies in place addressing			
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.  137 Does the Entity have policies in place addressing	123	Other (specify)	Independent Testing Procedure (tTP) conducted by Internal Audit as well as by AML. Division
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.  13. FRAUD  14. FRAUD  15. Does the Entity have policies in place addressing			
section are representative of all the LE's branches  125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  13. FRAUD  127 Does the Entity have policies in place addressing		tracked to completion and assessed for adequacy and completeness?	Yes
125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  14. FRAUD  127 Does the Entity have policies in place addressing	125		Yes
126 If appropriate, provide any additional information/context to the answers in this section.  14. FRAUD  127 Does the Entity have policies in place addressing		If N, clarify which questions the difference/s relate to	
information/context to the answers in this section.  14. FRAUD  127 Does the Entity have policies in place addressing			· · · · · · · · · · · · · · · · · · ·
14. FRAUD 127 Does the Entity have policies in place addressing		information/context to the answers in this section.	I N/A
14. FRAUD 127 Does the Entity have policies in place addressing		eg trafficient	
127 Does the Entity have policies in place addressing	14. FRAIIN		Market Barrier and Control of the Co
Yes Yes	127		Yes
Does the Entity have a dedicated team responsible for preventing & detecting fraud?  Yes			Yes



	Does the Entity have real time monitoring to detect	No
130	fraud?  Do the Entity's processes include gathering additional information to support its fraud controls, for	Yes
31	example: IP address, GPS location, and/or device ID?  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.	N/A
132	If appropriate, provide any additional information/context to the answers in this section.	N/A
Volfsberg	tion Statement  Group Correspondent Banking Due Diligence Questionnaire 2023 (C in Statement (To be signed by Global Head of Correspondent Bar by Laundering, Chief Compliance Officer, Global Head of Financia	king or equivalent position holder ANO Group Money Laundering Prevention Officer, Global Head of
Ang- Mone	ay Laundening, Chiai Compilance Officer, Global Flead of Financia	Chilles Compliance Chi equinality
Midland E	Bank Limited (Financial Institu	tion name) is fully committed to the fight against financial crime and makes
every effo	rt to remain in full compliance with all applicable financial crime lav	vs, regulations and standards in all of the jurisdictions in which it does business and holds accounts.
every effo The Finan	rt to remain in full compliance with all applicable financial crime lav	tion name) is fully committed to the fight against financial crime and makes vs., regulations and standards in all of the jurisdictions in which it does business and holds accounts. tive and sustainable controls to combat financial crime in order to protect its reputation and to meet its
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Md. Zahid Hossain Deputy Managing Director midlandbank Ltd. Head Office, Dhaka