

Financial Institution Name: Location (Country) : Danske Andelskassers Bank A/S Denmark

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. It is need to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	
		Danske Andelskassers Bank A/S
2	Append a list of foreign branches which are covered by	
	this questionnaire	All Danish branches. Our bank is not active outside of Denmark.
3	Full Legal (Registered) Address	Baneskellet 1, Hammershøj, DK 8830 Tjele, Denmark
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	October 11th 1969 as per public register www.cvr.dk
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	Traded at Nasdaq Copenhagen, DAB, DANSKE ANDELSKASSERS BANK, (DK0060299063)
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	No.
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	0%
3	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
За	If Y, provide the name of the relevant branch/es which operate under an OBL	
)	Does the Bank have a Virtual Bank License or provide services only through online channels?	no
10	Name of primary financial regulator/supervisory authority	The Danish FSA
1	Provide Legal Entity Identifier (LEI) if available	549300JECLPX13NZLU57
	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	
3	Jurisdiction of licensing authority and regulator of ultimate parent	
	parota	
	Select the business areas applicable to the Entity	Yes

	Commercial Bankins	M
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	Yes
14 i	Multilateral Development Bank	No
14 j	Wealth Management	Yes
14 k	Other (please explain)	The definition for small and medium enterprises (SMEs) as defined by Commission Recommendation 2003/361/ EC, apply to the majority of our commercial customer portfolio
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it denve more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	No
15 a	If Y, provide the top five countries where the non- resident customers are located	
16	Select the closest value	
16 a	Number of employees	201-500
16 b	Total Assets	
17	Confirm that all responses provided in the above Section	Greater than \$500 million
	are representative of all the LE's branches	Yes
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
18	If appropriate, provide any additional information/context to the answers in this section.	
	to the answers in this section.	
2. PROD	to the answers in this section. UCTS & SERVICES	
2. PROD 19	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services	
2. PROD 19	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking	Yes
2. PROD 19 19 a 19 a1	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking	Yes No
2. PROD 19 19 a 19 a 19 a1 19 a1a	to the answers in this section. UCTS & 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	
2. PROD 19 19 a 19 a1 19 a1a 19 a1b	to the answers in this section. UCTS & 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 .
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2. PROD 19 19 a 19 a1 19 a1a 19 a1a 19 a1c 19 a1c 19 a1d 19 a1f 19 a1f 19 a1f	UCTS & 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 (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	No Yes No No Yes
2. PROD 19 19 a 19 a1 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1e 19 a1f	UCTS & 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 fore 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)? MSBs	No Yes No No Yes
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10 11	Book Bull	
19 a1i	Does the Entity have processes and procedures in	
	place to identify downstream relationships with	Yes
40.6	MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	No
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No
19 f	International Cash Letter	No.
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No .
19 i	Payment services to non-bank entities who may then	140
101	offer third party payment services to their customers?	
	oner third party payment services to their customers?	No
19 i1	If Y , please select all that apply below?	
19 i2	Third Party Payment Service Providers	No
19 i3	Virtual Asset Service Providers (VASPs)	No.
19 i4	eCommerce Platforms	No
19 i5	Other - Please explain	NO.
	Other - Fledde explain	
		None
19 j	Private Banking	Both
19 k	Remote Deposit Capture (RDC)	No
191	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No No
19 n	Trade Finance	
19 0	Virtual Assets	Yes
		No
19 p	For each of the following please state whether you	
	offer the service to walk-in customers and if so, the	
40 -4	applicable level of due diligence	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	No -
	If yes, state the applicable level of due diligence	
19 p4a	If yes, state the applicable level of due diligence If you offer other services to walk-in customers	
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19 p4a	If you offer other services to walk-in customers please provide more detail here, including	
19 p4a	If you offer other services to walk-in customers	We do not affer services to walk-in customers.
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.	
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19 p4a 19 p5 19 q 20 20 a 21 3. AML, C 22	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to If appropriate, provide any additional information/context to the answers in this section.	We do not offer services to walk-in customers. None Yes Yes
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19 p4a 19 p5 19 q 20 20 a 21 3. AML, C 22 22 a 22 b 22 c	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components. Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership	We do not offer services to walk-in customers. None Yes Yes Yes Yes Yes
19 p4a 19 p5 19 q 20 20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components. Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting	We do not affer services to walk-in customers. None Yes Yes Yes Yes Yes Yes Yes Y
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19 p4a 19 p5 19 q 20 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference's relate to and the branch/es that this applies to If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components. Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	We do not offer services to walk-in customers. None Yes Yes Yes Yes Yes Yes Yes Y
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19 p4a 19 p5 19 q 20 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference's relate to and the branch'es that this applies to If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	We do not offer services to walk-in customers. None Yes Yes Yes Yes Yes Yes Yes Y
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22 m	Constitution Analysis Day	To the second se
0.5	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML	11-100
	CTF & Sanctions Compliance Department?	
24	Is the Entity's AML, CTF & Sanctions policy approved at	
	least annually by the Board or equivalent Senior	Yes
	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	Yes
	programme?	
26	Does the Entity use third parties to carry out any	
	components of its AML, CTF & Sanctions programme?	No.
26 a	If Y, provide further details	
27	Door the calify the call the c	
27	Does the entity have a whistleblower policy? Confirm that all responses provided in the above Section	Yes
20	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	
	and the state of the separation	1
29	If appropriate provide any state of the	
23	If appropriate, provide any additional information/context to the answers in this section.	
	o dio dilawara il mia serdott	
	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and	No
	requirements to reasonably prevent, detect and report	
31	bribery and corruption? Does the Entity have an enterprise wide programme that	
٥.	sets minimum ABC standards?	No
32	Has the Entity appointed a designated officer or officers	
	with sufficient experience/expertise responsible for	No
	coordinating the ABC programme?	
33	Does the Entity have adequate staff with appropriate	
	levels of experience/expertise to implement the ABC	Yes
-	programme?	
34	Is the Entity's ABC programme applicable to:	Not Applicable
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This	
	includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	No.
	improperly intended to influence action or obtain an	No
	advantage	
35 b	Includes enhanced requirements regarding interaction	
	with public officials?	Tes
35 c	Includes a prohibition against the falsification of books	
	and records (this may be within the ABC policy or any	L.
	other policy applicable to the Legal Entity)?	No
36	Does the Entity have controls in place to monitor the	N-
	effectiveness of their ABC programme?	No
37	Does the Board receive, assess, and challenge regular	Mo
	reporting on the status of the ABC programme?	No
38	Has the Entity's ABC Enterprise Wide Risk Assessment	
	(EWRA) been completed in the last 12 months?	No
38 a	If N, provide the date when the last ABC EWRA was	
	completed.	
		Not Applicable
39	Does the Entity have an ABC residual risk rating that is	
	the net result of the controls effectiveness and the	No
	inherent risk assessment?	
40	Does the Entity's ABC EWRA cover the inherent risk	
	components detailed below:	
40 40 a	Components detailed below: Potential liability created by intermedianes and other	No No
40 a	components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate	No.
	components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and	
40 a	components detailed below. Potential liability created by intermedianes and other third-party providers as appropriate. Corruption risks associated with the countries and industries in which the Entity does business, directly or	
40 a 40 b	components detailed below: Potential liability created by intermedianes and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	
40 a	components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate. Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries. Transactions, products or services, including those	No
40 a 40 b	components detailed below: Potential liability created by intermedianes and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	No
40 a 40 b	components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate. Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries. Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials. Corruption risks associated with gifts and hospitality.	No No
40 a 40 b 40 c	components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate. Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries. Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials. Corruption risks associated with gifts and hospitality.	No
40 a 40 b 40 c	components detailed below. Potential liability created by intermediaries and other third-party providers as appropriate. Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries. Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials. Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political.	No No

40 e	Changes in business activities that may materially	
	increase the Entity's corruption risk	No
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	No
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	No
42 b	1st Line of Defence	No
42 c	2nd Line of Defence	No
42 d	3rd Line of Defence	No
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
42 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	No
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	Bribery and Corruption is covered under Danish Crimial laws section 122, 144 and 299. ABC is indirectly adopted through other policies in the bank. Danske Andelskassers Bank also support the Whistleblower Portal for staff to report potential violations of Financial and AML regulations.
5. AML.	CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	
47	Are the Entity's policies and procedures updated at least annually?	Yes Yes
48	Has the Entity chosen to compare its policies and procedures against	
48 a	U.S. Standards	No
48 a1	If Y, does the Entity retain a record of the results?	TTO TO THE TOTAL THE TOTAL TO T
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	Not Applicable
49	Does the Entity have policies and procedures that:	· · · · · · · · · · · · · · · · · · ·
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
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 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close	Yes

49 i	Define the process for escalating financial crime risk	
	issues/potentially suspicious activity identified by	Yes
	employees	
49 j	Define the process, where appropriate, for terminating	
	existing customer relationships due to financial crime	Yes
	nsk	
49 k	Define the process for exiting clients for financial	
	crime reasons that applies across the entity, including	Yes
	foreign branches and affiliates	
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	Yes
	relationship	
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	Yes
	"watchlists"	163
50	Has the Entity defined a risk tolerance statement or	
	similar document which defines a risk boundary around	Yes
	their business?	
51	Does the Entity have record retention procedures that	Yes
	comply with applicable laws?	1.00
51 a	If Y, what is the retention period?	
		5 years or more
52	Confirm that all responses arounded in the above 2	
JE	Confirm that all responses provided in the above Section	Yes
52 a	are representative of all the LE's branches	
02 d	if N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context	
	to the answers in this section	
	TO THE STORY OF TH	
6. AML, C	TF & SANCTIONS RISK ASSESSMENT	
	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF FWRA cover the inherent	
6. AML, C 54	Does the Entity's AML & CTF EWRA cover the inherent	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Vec.
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes
54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Yes
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Yes
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
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 controls	Yes Yes
54 a 54 b 54 c 54 d 55	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
54 a 54 b 54 c 54 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: Transaction Monitoring	Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 d 55 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: Transaction Monitoring Customer Due Diligence	Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 a 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
54 a 54 b 54 c 54 d 55 c 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
54 a 54 b 54 c 54 d 55 c 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 Name Screening against Adverse Media/Negative	Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 a 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 News	Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 c 55 d 55 a 55 b 55 c 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 News Training and Education	Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 c 55 d 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 a 54 b 54 c 54 d 55 c 55 c 55 d 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 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 f 55 f 55 f 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 Training and Education Governance Management Information Has the Entity's AML & CTF EW/PA been completed in	Yes
54 a 54 b 54 c 54 d 55 a 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 Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EW/PA been completed in	Yes
54 a 54 b 54 c 54 d 55 5 5 5 5 5 5 d 55 5 d 55 5 d 55 6	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?	Yes
54 a 54 b 54 c 54 d 55 5 5 5 5 5 5 d 55 5 d 55 5 d 55 6	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	Yes
54 a 54 b 54 c 54 d 55 5 5 5 5 5 5 d 55 5 d 55 5 d 55 6	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?	Yes
54 a 54 b 54 c 54 d 55 5 5 5 5 5 5 d 55 5 d 55 5 d 55 6	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	Yes
54 a 54 b 54 c 54 d 555 c 55 b 55 c 55 d 55 c 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.	Yes
54 a 54 b 54 c 54 d 55 55 c 55 b 55 c 55 d 55 c 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	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 c 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.	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 c 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 b 54 c 54 d 555 c 55 a 55 c 55 d 55 c 55 f 55 g 55 f 56 a 56 a 56 a 57	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 b 54 c 54 d 55 5 c 55 a 55 5 b 55 c 55 d 55 c 55 d 55 c 55 d 55 6 6 6 a 57 a 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	Yes
54 a 54 b 54 c 54 d 55 b 55 a 555 b 55 c 55 f 55 g 55 h 56 a 57 a 57 a 57 b 57 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 Client Channel	Yes
54 a 54 a 54 b 54 c 54 c 55 5 5 5 5 5 5 5 6 55 6 6 56 a 57 c 57 c 57 c 57 d 57 d 577 d 577 d 577 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: Client Product Channel Geography	Yes
54 a 54 a 54 b 54 c 54 c 55 5 5 5 5 5 5 5 6 55 6 6 56 a 57 c 57 c 57 c 57 d 57 d 577 d 577 d 577 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: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls.	Yes
54 a 54 b 54 c 54 c 55 c 55 a 55 b 55 c 55 d 55 c 55 d 55 6 a 57 c 57 c 57 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
54 a 54 a 54 b 54 c 54 d 55 5 a 55 5 b 55 c 55 5 d 55 5 d 55 6 6 6 6 6 6 6 6 6 6 6	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 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 54 d 555 c 55 a 55 c 55 d 55 c 55 d 55 c 6 57 a 57 b 57 c 57 d 58 8 58 8 58 8 58 8 58 8 58 8 58 8	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	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 List Management	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 f 55 f 55 f 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 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 List Management	Yes

58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the	Yes
	last 12 months?	res
59 a	If N, provide the date when the last Sanctions EWRA	
	was completed	
		ł
60	Confirm that all responses provided in the above Section	
50	are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
	and the shalleres that this applies to	ł
61	If appropriate, provide any additional information/context	
	to the answers in this section.	
7. KYC.	CDD and EDD	Control of the Contro
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	
	CDD must be completed, e.g. at the time of onboarding	Yes
82	or within 30 days?	
64	Which of the following does the Entity gather and retain	
	when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied to	25%
	beneficial ownership identification?	25%
67	Does the due diligence process result in customers	Yes
	receiving a risk classification?	105
67 a	If Y, what factors/criteria are used to determine the	
07 -4	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)	
68	For high risk non-individual customers, is a site visit a part	Vas
	of your KTC process?	190
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2		No
68 a3		Yes
68 a4		No
68 a4a	If yes, please specify "Other"	
	Door the Entity have a risk hased secreed to	
69		
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes
69		Yes
		Yes
69 a 69 a 69 a1 69 a2	customers for Adverse Media/Negative News? If Y, is this at:	Yes Yes

60 22	Trigger except	TV CONTROL OF THE PARTY OF THE
69 a3 70	Trigger event	Yes
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening	
	customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk	
	rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	No
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	EDD on risk-based approach
76 b	Respondent Banks	Do not have this category of customer or industry
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	Do not have this category of customer or industry
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	EDD on risk-based approach
76 g		Prohibited
76 h		Prohibited
76 i		Prohibited
76 j		EDD on risk-based approach
76 k		Always subject to EDD
761	Nuclear power	Do not have this category of customer or industry
76 m	Payment Service Providers	Prohibited
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	EDD on risk-based approach
76 r	Red light businesses/Adult entertainment	Prohibited
76 s		EDD on risk-based approach
76 t		Prohibited
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v	Unregulated charities	EDD on risk-based approach
76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers	Prohibited
76 y	Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/or compliance approval?	No

		
78 a	If Y indicate who provides the approval	
79	Does the Entity have specific procedures for onboarding	
	entities that handle client money such as lawyers,	Yes
	accountants, consultants, real estate agents?	[]
80	Does the Entity perform an additional control or quality	
60	review on clients subject to EDD?	Yes
81		
01	Confirm that all responses provided in the above Section	Yes
81 a	are representative of all the LE's branches	NAMES OF THE PROPERTY OF THE P
01 A	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
82	If appropriate, provide any additional information/context	
02	to the answers in this section.	
	to the answers in this section.	
8 MONIT	TORING & REPORTING	
83	Does the Entity have risk based policies, procedures and	
03		
	monitoring processes for the identification and reporting	Yes
0.4	of suspicious activity?	
84	What is the method used by the Entity to monitor	Automated
04 -	transactions for suspicious activities?	A MANUAL CONTRACTOR OF THE PROPERTY OF THE PRO
84 a	If manual or combination selected, specify what type	
	of transactions are monitored manually	
84 b	If automated or combination selected, are internal	
04 D	system or vendor-sourced tools used?	Vendor-sourced tools
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is	
04 01	the name of the vendor/tool?	
	the name of the vendontoor?	SAS AML
		one rung
84 b2	When was the tool last updated?	< 1 year
2412	BUT TO ME THE RESIDENCE OF THE PROPERTY AND A SECOND	i year
84 b3	When was the automated Transaction Monitoring	< 1 year
	application last calibrated?	- 4
85	Does the Entity have regulatory requirements to report	Yes
	suspicious transactions?	
85 a	If Y, does the Entity have policies, procedures and	
	processes to comply with suspicious transaction	Yes
	reporting requirements?	
86	Does the Entity have policies, procedures and processes	
	to review and escalate matters arising from the	Yes
	monitoring of customer transactions and activity?	
87	Does the Entity have a data quality management	
	programme to ensure that complete data for all	Yes
	transactions are subject to monitoring?	
88	Does the Entity have processes in place to respond to	
	Request For Information (RFIs) from other entities in a	Yes
	timely manner?	
89	Does the Entity have processes in place to send	
	Requests for Information (RFIs) to their customers in a	Yes
	timely manner?	· · · ·
90	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
	and the prancines that this applies to	
91	If appropriate, provide any additional information/context	
-500	to the answers in this section	
	The second of the second of	
9. PAYME	ENT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment	
	Transparency Standards?	Yes

93 a FATF Reccion plance with compliance with several part of the		
93 a FATF Reci 93 b Local Regi 94 Does the Entity required and a border paymer 95 Does the Entity required beneficiary payments? 96 Confirm that all are representa 96 a If Y, clarify and the bra 97 If appropriate, growing to the answers 10. SANCTIONS 98 Does the Entity management re applicable to the business condu- foreign financia 99 Does the Entity controls reason another entity's the other entity to the other entity 100 Does the Entity controls reason actions taken to such as strippin sanctions releve transactions? 101 Does the Entity ownership inforr onboarding and Lists? 102 What is the met screening? 103 Fautomated screening? 104 What is the met 105 Does the Entity including at a mic contained in cros Lists? 104 What is the met 105 Does the Entity programme to the programme to	tity have policies procedures and processes th and have controls in place to ensure	
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102 What is the met screening? 102 a If 'automated selected' 102 a1 Are intern 102 a1a If a 've what i what is the method of the Entity including at a min contained in cross Lists? 104 What is the method of wh	y screen its customers, including beneficial ormation collected by the Entity, during id regularly thereafter against Sanctions	Yes
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104 What is the meth 105 Does the Entity h programme to en transactions are	y screen all sanctions relevant data,	Yes
Does the Entity h programme to er transactions are	ethod used by the Entity?	Combination of automated and manual
106 Select the Sanct	have a data quality management ensure that complete data for all	Yes
	e subject to sanctions screening? ctions Lists used by the Entity in its	
sanctions screen	ening processes	
Sanctions Lis	ist (UN)	Used for screening customers and beneficial owners and for filtering transactional data
Foreign Asse	sets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
(OFSI)	вания односоно ппреписиавоп нит	Used for screening customers and beneficial owners and for filtering transactional data

106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	g
107	When regulatory authorities make updates to their	
101	Sanctions list, how many business days before the entity updates their active manual and/or automated screening	
	systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	
11. TRAINI	ING & EDUCATION Does the Entity provide mandatory training, which	
2505(5)	includes	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
112 f	Non-employed workers (contractors/consultants)	Not Applicable
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles responsibilities and high risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Other
115	Confirm that all responses provided in the above Section	

party cover the following areas AML_CTF, ABC, Fraud and Sanctions policy and procedures AML_CTF, ABC, Fraud and Sanctions policy and procedures Covernance			
116 If appropriate, provide any additional information/content to the enterwers in the section. 117 If the enterwers in the section in the enterwers in the section. 118 COURAITY ASSURANCE: ICOMPLIANCE TESTING: 119 Cons the Entity have a program who first based Quality, Assurance programs for first based Quality. Assurance programs for first read state of the provide in the section. 119 Confer the Entity have a program who first based Quality. 119 Confer the Entity have a program who first based Quality. 119 Confer the Entity have a program who rate based Quality. 119 Confer the third an response provided in the above Section. 119 and the Pranchives that this applies to consider the entity have an enterval and the Pranchives that this applies to the entity of the enterview o	115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
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Assurance programme for financial come (separate from the the independent Audit functions) 118 Does the Entity have a program vote from the independent audit functions of the Entity have a program vote from the independent audit functions of the Entity have a program vote from the independent audit function are representative at all the Es branches and the above Section are representative at all the Es branches and the section of the Entity and the Est branches are the program vote from the independent to the array additional information/context to the array and additional information/context to the array additional information policy and years. 122 b. External Third Party 123 b. External Third Party 124 c. Governance 125 c. Governance 126 c. Governance 127 c. Fortier and Mark Each Assessment 128 visual and additional information policy and years 129 c. Governance 129 c. Governance 129 c. Fortier and Additional information/context to the arroy additional information/context to the arroy additional information/context to the arroy and additional information/context to the arroy a			
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Complaince Testing process (separate from the Independent Process of Process (separate from the Independent Process of Pr		the independent Audit function)?	
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procedures	422 -	party cover the following areas:	
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123 d KYC/CDD/EDD and underlying methodologies Yes	123 b		Yes
Name Screening & List Management Yes Reporting/Metrics & Management Information Yes Suspicious Activity Filing Yes Tansaction Monitoring Yes Transaction Monitoring Yes Transaction Screening including for sanctions Yes Transaction Monitoring Y			
Reporting/Metrics & Management Information Yes			
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123 i Transaction Monitoring Yes 123 i Transaction Screening including for sanctions Yes 123 k Training & Education Yes 123 l Other (specify) 124 Are adverse findings from internal & external audit tracked to 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. 14. FRAUD 17 Does the Entity have policies in place addressing fraud risk? 18 Does the Entity have a dedicated team responsible for Yes 18 Does the Entity have a dedicated team responsible for Yes 18 Does the Entity have a dedicated team responsible for Yes	123 g	Suspicious Activity Filing	
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129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example, IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N. clarify which questions the difference/s relate to and the branch/es that this applies to	
132	If appropriate, provide any additional information/context to the answers in this section.	

Declaration Statement

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

Danske Andelskassers Bank A/S (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

l. Robert Krogh Lauridsen (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

I, Luise Kvist Guldbæk, MERC or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I any authorised to execute this declaration on behalf of the Financial Institution.

12/9-24 (Signature & Date)