

the Wolfsberg Group

Financial Institution Name:


Location (Country):

No #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal name	
2	Append a list of foreign branches which are covered by this questionnaire	
3	Full Legal (Registered) Address	
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	
6 c	Government or State Owned by 25% or more	
6 d	Privately Owned	
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	
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	
10	Provide Legal Entity Identifier (LEI) if available	
2. AML, CTF & SANCTIONS PROGRAMME		
11	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
11 a	Appointed Officer with sufficient experience/expertise	
11 b	Adverse Information Screening	
11 c	Beneficial Ownership	
11 d	Cash Reporting	
11 e	CDD	
11 f	EDD	

11 g	Independent Testing	
11 h	Periodic Review	
11 i	Policies and Procedures	
11 j	PEP Screening	
11 k	Risk Assessment	
11 l	Sanctions	
11 m	Suspicious Activity Reporting	
11 n	Training and Education	
11 o	Transaction Monitoring	
12	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	
13	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	
13 a	If Y, provide further details	
14	Does the entity have a whistleblower policy?	
3. ANTI BRIBERY & CORRUPTION		
15	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	
16	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	
17	Does the Entity provide mandatory ABC training to:	
17 a	Board and Senior Committee Management	
17 b	1st Line of Defence	
17 c	2nd Line of Defence	
17 d	3rd Line of Defence	
17 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	
17 f	Non-employed workers as appropriate (contractors/consultants)	
4. AML, CTF & SANCTIONS POLICIES & PROCEDURES		
18	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
18 a	Money laundering	
18 b	Terrorist financing	
18 c	Sanctions violations	
19	Does the Entity have policies and procedures that:	
19 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	
19 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	
19 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	
19 d	Prohibit accounts/relationships with shell banks	
19 e	Prohibit dealing with another Entity that provides services to shell banks	
19 f	Prohibit opening and keeping of accounts for Section 311 designated entities	
19 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	
19 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	
19 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	
19 j	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	

20	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	
21	Does the Entity have record retention procedures that comply with applicable laws?	
21 a	If Y, what is the retention period?	
5. KYC, CDD and EDD		
22	Does the Entity verify the identity of the customer?	
23	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?	
24	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
24 a	Customer identification	
24 b	Expected activity	
24 c	Nature of business/employment	
24 d	Ownership structure	
24 e	Product usage	
24 f	Purpose and nature of relationship	
24 g	Source of funds	
24 h	Source of wealth	
25	Are each of the following identified:	
25 a	Ultimate beneficial ownership	
25 a1	Are ultimate beneficial owners verified?	
25 b	Authorised signatories (where applicable)	
25 c	Key controllers	
25 d	Other relevant parties	
26	Does the due diligence process result in customers receiving a risk classification?	
27	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
28	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?	
29	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	
29 a	If yes, select all that apply:	
29 a1	Less than one year	
29 a2	1 – 2 years	
29 a3	3 – 4 years	
29 a4	5 years or more	
29 a5	Trigger-based or perpetual monitoring reviews	
29 a6	Other (please specify)	
30	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?	
30 a	Arms, Defence, Military	
30 b	Respondent Banks	
30 b1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	
30 c	Embassies/Consulates	
30 d	Extractive industries	
30 e	Gambling customers	
30 f	General Trading Companies	
30 g	Marijuana-related Entities	
30 h	MSB/MVTS customers	
30 i	Non-account customers	
30 j	Non-Government Organisations	
30 k	Non-resident customers	

30 l	Nuclear power	
30 m	Payment Service Providers	
30 n	PEPs	
30 o	PEP Close Associates	
30 p	PEP Related	
30 q	Precious metals and stones	
30 r	Red light businesses/Adult entertainment	
30 s	Regulated charities	
30 t	Shell banks	
30 u	Travel and Tour Companies	
30 v	Unregulated charities	
30 w	Used Car Dealers	
30 x	Virtual Asset Service Providers	
30 y	Other (specify)	
31	If restricted, provide details of the restriction	
6. MONITORING & REPORTING		
32	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	
33	What is the method used by the Entity to monitor transactions for suspicious activities?	
33 a	If manual or combination selected, specify what type of transactions are monitored manually	
34	Does the Entity have regulatory requirements to report suspicious transactions?	
34 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	
35	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	
7. PAYMENT TRANSPARENCY		
36	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	
37	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
37 a	FATF Recommendation 16	
37 b	Local Regulations	
37 b1	If Y, Specify the regulation	
37 c	If N, explain	
8. SANCTIONS		
38	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?	
39	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?	

40	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	
41	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
41 a	Consolidated United Nations Security Council Sanctions List (UN)	
41 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	
41 d	European Union Consolidated List (EU)	
41 e	Lists maintained by other G7 member countries	
41 f	Other (specify)	
42	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?	
9. TRAINING & EDUCATION		
43	Does the Entity provide mandatory training, which includes:	
43 a	Identification and reporting of transactions to government authorities	
43 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
43 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	
43 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	
44	Is the above mandatory training provided to :	
44 a	Board and Senior Committee Management	
44 b	1st Line of Defence	
44 c	2nd Line of Defence	
44 d	3rd Line of Defence	
44 e	Third parties to which specific FCC activities have been outsourced	
44 f	Non-employed workers (contractors/consultants)	
10. AUDIT		
45	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	
<p>Signature Page</p> <p>Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2)</p> <p>_____ (Financial Institution name)</p> <p>I, _____ (Senior Compliance Manager- Second Line representative), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief.</p> <p> 6 June 2024 (Signature & Date)</p>		

List of Entities

The Netherlands CEO Robert Swaak			
ABN AMRO Bank N.V.	Gustav Mahlerlaan 10 1082 PP Amsterdam The Netherlands	The Netherlands	De Nederlandsche Bank (DNB) European Central Bank (ECB) Autoriteit Financiële Markten (AFM)
ABN AMRO Clearing Bank N.V.	Gustav Mahlerlaan 10 1082 PP Amsterdam The Netherlands	The Netherlands	De Nederlandsche Bank (DNB) European Central Bank (ECB) Autoriteit Financiële Markten (AFM)
ABN AMRO Hypotheken Groep B.V.	Postbus 1700 3800 BS Amersfoort The Netherlands	The Netherlands	De Nederlandsche Bank (DNB) European Central Bank (ECB) Autoriteit Financiële Markten (AFM)
ABN AMRO Groenbank B.V.	Gustav Mahlerlaan 10 1082 PP Amsterdam The Netherlands	The Netherlands	De Nederlandsche Bank (DNB) European Central Bank (ECB) Autoriteit Financiële Markten (AFM)
International Card Services B.V.	Wisselwerking 32 1112 XP Diemen The Netherlands	The Netherlands	De Nederlandsche Bank (DNB) European Central Bank (ECB) Autoriteit Financiële Markten (AFM)
ABN AMRO Asset Based Finance N.V.	Beneluxlaan 1010 3526 KK Utrecht The Netherlands	The Netherlands	De Nederlandsche Bank (DNB) Autoriteit Financiële Markten (AFM)
Australia CEO Adrian Rubin			
ABN AMRO Clearing Sydney Pty Limited	Level 11, 580 George Street Sydney NSW 2000 Australia	Australia	Australian Securities and Investment Commission (ASIC) Australian Transaction Reports and Analysis Centre (ASTRAC) Foreign Investment Review Board (FIRB)
Belgium Country Executive Joachim Aelvoet			
ABN AMRO Bank N.V., Belgium Branch	Borsbeeksebrug 30 2600 Antwerpen Berchem België	Belgium	De Nederlandsche Bank (DNB) European Central Bank (ECB) Autoriteit Financiële Markten (AFM) Nationale Bank van België (NBB) Autoriteit voor Financiële Diensten en Markten (FSMA)
Brazil CEO Silvio Lomnitzer			
Banco ABN AMRO Clearing S.A.	Rua Fidencio Ramos 302 Andar 11 Vila Olimpia São Paulo SP 04551-010 Brazil	Brazil	Banco Central do Brasil
ABN AMRO Clearing Corretora de Títulos e Valores Mobiliários Ltda	Rua Fidencio Ramos 302 Andar 11 Vila Olimpia São Paulo SP 04551-010 Brazil	Brazil	Banco Central do Brasil
France Country Executive Laurent Garret			
ABN AMRO Bank N.V., Paris Branch (Banque Neuflyze OBC)	119-121 boulevard Haussmann 75008 Paris France	France	De Nederlandsche Bank (DNB) European Central Bank (ECB) Autoriteit Financiële Markten (AFM) Autorité de Contrôle Prudentiel et de Résolution (ACPR)
ABN AMRO Asset Based Finance (ABF), France Branch	39 rue Anatole France 92535 Levallois Perret cedex France	France	De Nederlandsche Bank (DNB) European Central Bank (ECB) Autorité de Contrôle Prudentiel et de Résolution (ACPR)
ABN AMRO Investments Solutions S.A.	121 boulevard Haussmann 75008 Paris France	France	Autorité des Marchés Financiers et de Résolution (AMF)
Germany Country Executive Hans Hanegraaf			
ABN AMRO Asset Based Finance N.V., Niederlassung Deutschland	Mainzer Landstraße 1 60329 Frankfurt am Main Germany	Germany	De Nederlandsche Bank (DNB) Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin) Bundesbank
ABN AMRO Bank N.V., Frankfurt Branch („Bethmann Bank“)	Mainzer Landstraße 1 60329 Frankfurt am Main Germany	Germany	De Nederlandsche Bank (DNB) European Central Bank (ECB) Autoriteit Financiële Markten (AFM) Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin) Bundesbank
International Card Services B.V., Niederlassung Deutschland	Parsevalstraße 9b 40468 Duesseldorf Germany	Germany	De Nederlandsche Bank (DNB) European Central Bank (ECB) Autoriteit Financiële Markten (AFM) Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin) Bundesbank Sektor Bankenaufsicht

Hong Kong CEO Paul Pealing			
ABN AMRO Clearing Hong Kong Ltd	Suites 2407 – 2409 Level 24 Three Pacific Place 1 Queen's Road East, Hong Kong	Hong Kong	Hong Kong Securities and Futures Commission (SFC)
Japan CEO Richard Patrick Clairmont			
ABN AMRO Clearing Tokyo Co. Ltd.	39F Atago Green Hills MORI Tower 2-5-1 Atago, Minato-ku Tokyo 105-6239 Japan	Japan	Japan Financial Services Agency
Norway Country Executive Nicolette Dijkshoorn			
ABN AMRO Bank N.V., Oslo Branch	Olav V gate 5 N-0161 Oslo Norway	Norway	De Nederlandsche Bank (DNB) European Central Bank (ECB) Finanstilsynet Kredittilsynet
Singapore CEO Robert Sim			
ABN AMRO Clearing Bank N.V., Singapore Branch	1182 Cecil Street, Level 23, Frasers Tower Singapore 069547	Singapore	De Nederlandsche Bank (DNB) European Central Bank (ECB) Monetary Authority of Singapore (MAS)
ABN AMRO Clearing Singapore PTE Ltd	1182 Cecil Street, Level 23, Frasers Tower Singapore 069547	Singapore	Monetary Authority of Singapore (MAS)
United Kingdom Country Executive Gerben Dragt			
ABN AMRO Asset Based Finance N.V., UK Branch	5 Aldermanbury Square EC2V 7HR London United Kingdom	United Kingdom	De Nederlandsche Bank (DNB) Financial Conduct Authority (FCA)
ABN AMRO Bank N.V., UK Branch	5 Aldermanbury Square EC2V 7HR London United Kingdom	United Kingdom	De Nederlandsche Bank (DNB) European Central Bank (ECB) Prudential Regulation Authority (PRA)
ABN AMRO Clearing London Limited	5 Aldermanbury Square EC2V 7HR London United Kingdom	United Kingdom	Financial Conduct Authority (FCA)
ABN AMRO Clearing Bank N.V., London Branch	5 Aldermanbury Square EC2V 7HR London United Kingdom	United Kingdom	De Nederlandsche Bank (DNB) European Central Bank (ECB) Prudential Regulation Authority (PRA)
United States Country Executive Boudewijn Duinstra			
ABN AMRO Clearing USA LLC	175 w Jackson Boulevard, suite 2050 Chicago IL 60604 United States of America	United States of America	Financial Industry Regulator Authority (FINRA) Securities Exchange Commission (SEC) Commodity Futures Trading Commission (CFTC)
ABN AMRO Securities (USA) LLC	303 George Street, Suite 307 New Brunswick NJ 08901 United States of America	United States of America	Financial Industry Regulator Authority (FINRA) Securities Exchange Commission (SEC) Commodity Futures Trading Commission (CFTC)
ABN AMRO Capital Markets (USA) LLC	250 Park Avenue, Suite 911 New York NY 10017 United States of America	United States of America	Financial Industry Regulator Authority (FINRA) Securities Exchange Commission (SEC) Commodity Futures Trading Commission (CFTC)
Greece Country Executive George Arcadis			
ABN AMRO Bank N.V., Athens Branch	38, Patriarchou Ioakim St. P.C 106-75 Athens, Greece	Greece	De Nederlandsche Bank (DNB) European Central Bank (ECB) Autoriteit Financiële Markten (AFM) The Bank of Greece