the Wolfsberg Group

Financial Institution Name:

BANCO BILBAO VIZCAYA ARGENTARIA S.A

Location (Country) :

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer
1. ENTI	TY & OWNERSHIP	
1	Full Legal Name	BANCO BILBAO VIZCAYA ARGENTARIA S.A
2	Append a list of foreign branches which are covered by this questionnaire	London, Frankfurt, Brussels, New York, Taipei, Seoul, Paris, Hong Kong, Milán, Tokyo, Singapore, Portugal, Shangai.
3	Full Legal (Registered) Address	Plaza de San Nicolás, 4- , 48005 - Bilbao
4	Full Primary Business Address (if different from above)	Calle Azul, 4, 28050, Madrid
5	Date of Entity incorporation/ establishment	Founded in 1857
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	"BBVA:SM Madrid, Barcelona, Bilbao, Valencia, London, Mexico, New York."
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%
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Name of primary financial regulator / supervisory authority	BANCO DE ESPAÑA

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10	Provide Legal Entity Identifier (LEI) if available	K8MS7FD7N5Z2WQ51AZ71
11	Provide the full legal name of the ultimate parent	
	(if different from the Entity completing the DDQ)	None
12	Jurisdiction of licensing authority and regulator of ultimate parent	SPAIN
13	Select the business areas applicable to the	
40 -	Entity	
13 a	Retail Banking	Yes
13 b	Private Banking / Wealth Management	Yes
13 c	Commercial Banking	Yes
13 d	Transactional Banking	Yes
13 e	Investment Banking	Yes
13 f	Financial Markets Trading	Yes
13 g	Securities Services / Custody	Yes
13 h	Broker / Dealer	Yes
13 i	Multilateral Development Bank	Yes
13 j	Other	None
14	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it	
	derive more than 10% of its revenue from non-	
	resident customers? (Non-resident means	No
	customers primarily resident in a different	
	jurisdiction to the location where bank services are provided.)	
14 a	If Y, provide the top five countries where the non-	
	resident customers are located.	
15	Select the closest value:	
15 a	Number of employees	10001+
15 b	Total Assets	Greater than \$500 million
16	Confirm that all responses provided in the above	
	Section ENTITY & OWNERSHIP are representative of all the LE's branches	No
16 a	If N, clarify which questions the difference/s	See annexes for all branches
	relate to and the branch/es that this applies to.	See annualise for an ordinate
16 b	If appropriate, provide any additional information	
	/ context to the answers in this section.	

	DUCTS & SERVICES	
17	Does the Entity offer the following products and services:	
17 a	Correspondent Banking	Yes
17 a1	If Y	
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?	Yes
17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?	Yes
17 a4	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?	Yes
17 a6	Does the Entity allow downstream relationships with Foreign Banks?	Yes
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	Yes
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	Yes
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?	No
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?	Yes
17 b	Private Banking (domestic & international)	Yes
17 с	Trade Finance	Yes
17 d	Payable Through Accounts	No
17 e	Stored Value Instruments	Yes
17 f	Cross Border Bulk Cash Delivery	No
17 g	Domestic Bulk Cash Delivery	No
17 h	International Cash Letter	Yes
17 i	Remote Deposit Capture	No
17 j	Virtual /Digital Currencies	No
17 k	Low Price Securities	No
17 I	Hold Mail	Yes
17 m	Cross Border Remittances	Yes
17 n	Service to walk-in customers (non-account holders)	Yes
17 o	Sponsoring Private ATMs	No
17 p	Other high risk products and services identified by the Entity	No
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	No
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	See annexes for all branches
18 b	If appropriate, provide any additional information / context to the answers in this section.	

3 AMI	CTF & SANCTIONS PROGRAMME	
3. AIVIL, 19	Does the Entity have a programme that sets	
19	minimum AML, CTF and Sanctions standards regarding the following components:	
19 a	Appointed Officer with sufficient experience/expertise	Yes
19 b	Cash Reporting	Yes
19 c	CDD	Yes
19 d	EDD	Yes
19 e	Beneficial Ownership	Yes
19 f	Independent Testing	Yes
19 g	Periodic Review	Yes
19 h	Policies and Procedures	Yes
19 i	Risk Assessment	Yes
19 j	Sanctions	Yes
19 k	PEP Screening	Yes
19 I	Adverse Information Screening	Yes
19 m	Suspicious Activity Reporting	Yes
19 n	Training and Education	Yes
19 o	Transaction Monitoring	Yes
20	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	51+
21	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	No. Describe your practice in Q24b
22	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	Quarterly/Every three months
23	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes
23 а	If Y, provide further details	Only one company 100% owned by the group, for back office and administrative tasks
24	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	No
24 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	See annexes for all branches
24 b	If appropriate, provide any additional information / context to the answers in this section.	Clarification #21: It is composed of several policies reviewed on an ongoing basis. Not necessarily every year, but some with a higher frequency. Approved at the level required by internal governance

	BRIBERY & CORRUPTION	
25	Has the Entity documented policies and	
-0	procedures consistent with applicable ABC	
	regulations and requirements to [reasonably]	Yes
	prevent, detect and report bribery and	163
	corruption?	
26	Does the Entity have an enterprise wide	
20	programme that sets minimum ABC standards?	Yes
	ļ	
27	Has the Entity appointed a designated officer or	
	officers with sufficient experience/expertise	Yes
	responsible for coordinating the ABC	1.65
	programme?	
28	Does the Entity have adequate staff with	
	appropriate levels of experience/expertise to	Yes
	implement the ABC programme?	
29	Is the Entity's ABC programme applicable to:	
	, , , , ,	Both joint ventures and third parties acting on behalf of the Entity
30	Does the Entity have a global ABC policy that:	
,,,	15003 the Entity have a global ABC policy that.	
30 a	Prohibits the giving and receiving of bribes?	
	This includes promising, offering, giving,	
	solicitation or receiving of anything of value,	Yes
	directly or indirectly, if improperly intended to	1.55
	influence action or obtain an advantage	
30 b	Includes enhanced requirements regarding	
JU 15	interaction with public officials?	Yes
	•	
30 с	Includes a prohibition against the falsification of	
	books and records (this may be within the ABC	Yes
	policy or any other policy applicable to the Legal	
	Entity)?	
31	Does the Entity have controls in place to monitor	Yes
	the effectiveness of their ABC programme?	res
32	Does the Entity's Board or Senior Management	
	Committee receive regular Management	Yes
	Information on ABC matters?	
33	Does the Entity perform an Enterprise Wide	
	ABC risk assessment?	Yes
33 a	If Y select the frequency	
		12 Months
34	Does the Entity have an ABC residual risk rating	
	that is the net result of the controls effectiveness	Yes
	and the inherent risk assessment?	165
35	Does the Entity's ABC EWRA cover the inherent	
99	· ·	
	risk components detailed below:	
35 a	Potential liability created by intermediaries and	Yes
	other third-party providers as appropriate	165
35 b	Corruption risks associated with the countries	
	and industries in which the Entity does business,	Yes
	directly or through intermediaries	
35 c	Transactions, products or services, including	
	those that involve state-owned or state-	Yes
		1 GS
) E al	•	
รอ ต		
		Yes
	•	
35 e	Changes in business activities that may	Voo
	materially increase the Entity's corruption risk	162
	materially mercace are zmary e corruption new	
36	Does the Entity's internal audit function or other	
		Yes
35 d 35 e	controlled entities or public officials Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions Changes in business activities that may	Yes Yes

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37	Does the Entity provide mandatory ABC training to:	
37 a	Board and senior Committee Management	Yes
37 b	1st Line of Defence	Yes
37 c	2nd Line of Defence	Yes
37 d	3rd Line of Defence	Yes
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	Yes
37 f	Non-employed workers as appropriate (contractors/consultants)	Yes
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	Yes
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
39 b	If appropriate, provide any additional information / context to the answers in this section.	Regarding question 37F, It should be noted that BBVA does not provide training to all non employed workers but it does provide training to certain high risk non-employed workers such as agents. BBVA requires all its third parties to certify their commitment to comply with all applicable anticorruption laws.

- ,	CTF & SANCTIONS POLICIES & PROCEI	DURES
40	Has the Entity documented policies and	
	procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to	
	reasonably prevent, detect and report:	
40 a	Money laundering	Yes
40 b	Terrorist financing	165
40 D	Terrorist infancing	Yes
40 с	Sanctions violations	Yes
41	Are the Entity's policies and procedures updated at least annually?	Yes
42	Are the Entity's policies and procedures gapped against/compared to:	
42 a	US Standards	Yes
42 a1	If Y, does the Entity retain a record of the results?	No
42 b	EU Standards	Yes
42 b1	If Y, does the Entity retain a record of the results?	Yes
43	Does the Entity have policies and procedures that:	
43 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
43 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
43 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
43 d	Prohibit accounts/relationships with shell banks	Yes
43 e	Prohibit dealing with another entity that provides services to shell banks	Yes
43 f	Prohibit opening and keeping of accounts for	Yes
43 g	Section 311 designated entities Prohibit opening and keeping of accounts for	
y	any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio,	Yes
43 h	bureaux de change or money transfer agents Assess the risks of relationships with domestic	
 0 II	and foreign PEPs, including their family and close associates	Yes
43 i	Define escalation processes for financial crime risk issues	Yes
43 j	Define the process, where appropriate, for	
	terminating existing customer relationships due to financial crime risk	Yes
43 k	Specify how potentially suspicious activity	
N	identified by employees is to be escalated and investigated	Yes
43 I	Outline the processes regarding screening for sanctions, PEPs and negative media	Yes
43 m	Outline the processes for the maintenance of	Yes
44	internal "watchlists" Has the Entity defined a risk tolerance statement	
	or similar document which defines a risk boundary around their business?	Yes
45	Does the Entity have a record retention	Yes
45 a	procedures that comply with applicable laws? If Y, what is the retention period?	E voors or more
		5 years or more
46	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	Yes
46 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to.	
46 b	If appropriate, provide any additional information	Clarification #42 a): BBVA Sanctions policies comply with OFAC regulations. Other AML policies
	/ context to the answers in this section.	

6. AML	., CTF & SANCTIONS RISK ASSESSMENT	
47	Does the Entity's AML & CTF EWRA cover the	
	inherent risk components detailed below:	
47 a	Client	Yes
47 b	Product	Yes
47 c	Channel	Yes
47 d	Geography	Yes
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	Yes
48 b	Customer Due Diligence	Yes
48 c	PEP Identification	Yes
48 d	Transaction Screening	Yes
48 e	Name Screening against Adverse Media & Negative News	Yes
48 f	Training and Education	Yes
48 g	Governance	Yes
48 h	Management Information	Yes
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	Yes
50 b	Product	Yes
50 c	Channel	Yes
50 d	Geography	Yes

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51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
51 a	Customer Due Diligence	Yes
51 b	Transaction Screening	Yes
51 c	Name Screening	Yes
51 d	List Management	Yes
51 e	Training and Education	Yes
51 f	Governance	Yes
51 g	Management Information	Yes
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
52 a	If N, provide the date when the last Sanctions EWRA was completed.	
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	Yes
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53 b	If appropriate, provide any additional information / context to the answers in this section.	

7. KYC	C, CDD and EDD	
54	Does the Entity verify the identity of the customer?	Yes
55	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
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	Yes
56 b	Customer identification	Yes
56 c	Expected activity	Yes
56 d	Nature of business/employment	Yes
56 e	Product usage	Yes
56 f	Purpose and nature of relationship	Yes
56 g	Source of funds	Yes
56 h	Source of wealth	Yes
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	Yes
57 a1	Are ultimate beneficial owners verified?	Yes
57 b	Authorised signatories (where applicable)	Yes
57 c	Key controllers	Yes
57 d	Other relevant parties	
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	25%
59	Does the due diligence process result in customers receiving a risk classification?	Yes

	Treate a treate a treate a treate a	
60	If Y, what factors/criteria are used to determine	
	the customer's risk classification? Select all that	
	apply:	
60 a	Product Usage	Yes
60 b	Geography	Yes
60 с	Business Type/Industry	Yes
60 d	Logal Entity type	
60 a	Legal Entity type	Yes
60 e	Adverse Information	
00 6	Adverse information	Yes
60 f	Other (specify)	
	Suisi (spesily)	
		We also use the duration of the relationship and the AML screenings
61	Does the Entity have a risk based approach to	
.	screening customers for adverse	Yes
	media/negative news?	
62	If Y, is this at:	
62 a	Onboarding	V
		Yes
62 b	KYC renewal	Yes
		165
62 c	Trigger event	Yes
63	What is the method used by the Entity to screen for adverse media / negative news?	Combination of automated and manual
64	Does the Entity have a risk based approach to	
04	screening customers and connected parties to	
	determine whether they are PEPs, or controlled	Yes
	by PEPs?	
65	If Y, is this at:	
65 a	Onboarding	Yes
		165
65 b	KYC renewal	Yes
		165
65 с	Trigger event	Yes
66	What is the method used by the Entity to screen	Combination of automated and manual
67	PEPs?	
01	Does the Entity have policies, procedures and processes to review and escalate potential	
	matches from screening customers and	Yes
	connected parties to determine whether they are	
	PEPs, or controlled by PEPs?	
68	Does the Entity have a process to review and	
	update customer information based on:	
68 a	KYC renewal	Yes
		100
68 b	Trigger event	Yes
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due	V
	diligence reviews?	Yes
L	ungonoc reviews:	

	,	
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?	
70 a	Non-account customers	Not EDD, not restricted or not prohibited on a risk based approach
70 b	Non-resident customers	Not EDD, not restricted or not prohibited on a risk based approach
70 c	Shell banks	Prohibited
70 d	MVTS/ MSB customers	EDD & restricted on a risk based approach
70 e	PEPs	EDD on a risk based approach
70 f	PEP Related	EDD on a risk based approach
70 g	PEP Close Associate	EDD on a risk based approach
70 h	Correspondent Banks	EDD on a risk based approach
70 h1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes
70 i	Arms, defense, military	EDD on a risk based approach
70 j	Atomic power	Not EDD, not restricted or not prohibited on a risk based approach
70 k	Extractive industries	Not EDD, not restricted or not prohibited on a risk based approach
70 I	Precious metals and stones	Not EDD, not restricted or not prohibited on a risk based approach
70 m	Unregulated charities	Not EDD, not restricted or not prohibited on a risk based approach
70 n	Regulated charities	Not EDD, not restricted or not prohibited on a risk based approach
70 o	Red light business / Adult entertainment	Not EDD, not restricted or not prohibited on a risk based approach
70 p	Non-Government Organisations	Not EDD, not restricted or not prohibited on a risk based approach
70 q	Virtual currencies	EDD on a risk based approach
70 r	Marijuana	Not EDD, not restricted or not prohibited on a risk based approach
70 s	Embassies/Consulates	Not EDD, not restricted or not prohibited on a risk based approach
70 t	Gambling	EDD on a risk based approach
70 u	Payment Service Provider	EDD & restricted on a risk based approach
70 v	Other (specify)	
71	If restricted, provide details of the restriction	MVTS/MSB customers are restricted and need authorization to be clients
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	No
73 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	See annexes for all branches.
73 b	If appropriate, provide any additional information / context to the answers in this section.	#57c: Key controllers are identified when they coincide with the Spanish law concept of beneficial owners (over 25%).

	UTABINA A REPORTINA	
-	NITORING & REPORTING	
74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
75	What is the method used by the Entity to monitor transactions for suspicious activities?	Automated
76	If manual or combination selected, specify what type of transactions are monitored manually	
77	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	Yes
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	See annexes for branches.
79 b	If appropriate, provide any additional information / context to the answers in this section.	

Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	Yes
Payment Transparency Standards? Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	Yes
processes to [reasonably] comply with and have controls in place to ensure compliance with:	
FATF Recommendation 16	
1	Yes
Local Regulations	Yes
Specify the regulation	EU Regulation 847/2015.
If N, explain	
Does the Entity have processes in place to respond to Request For Information (RFIs) from	Yes
Does the Entity have controls to support the inclusion of required and accurate originator	Yes
Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?	Yes
Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	Yes
If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	See annexes for branches.
If appropriate, provide any additional information / context to the answers in this section.	
	Specify the regulation If N, explain Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages? Does the Entity have controls to support the inclusion of required beneficiary information international payment messages? Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY 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.

10. SA	NCTIONS	
86	Does the Entity have a Sanctions Policy	
	approved by management regarding	
	compliance with sanctions law applicable to the	l.,
	Entity, including with respect its business	Yes
	conducted with, or through accounts held at	
	foreign financial institutions?	
87	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	No
	sanctions prohibitions applicable to the other	
	entity (including prohibitions within the other	
	entity's local jurisdiction)?	
88	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	Yes
	resubmission and/or masking, of sanctions	165
	relevant information in cross border	
	transactions?	
89	Does the Entity screen its customers, including	
l	beneficial ownership information collected by the	
	Entity, during onboarding and regularly	Yes
	thereafter against Sanctions Lists?	
90	What is the method used by the Entity?	
	What is the meaned deed by the Entity.	Automated
91	Does the Entity screen all sanctions relevant	
	data, including at a minimum, entity and location	Yes
	information, contained in cross border	res
	transactions against Sanctions Lists?	
92	What is the method used by the Entity?	
		Automated
93	Select the Sanctions Lists used by the Entity in	
	its sanctions screening processes:	
93 a	Consolidated United Nations Security Council	
	Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
93 b	United States Department of the Treasury's	Used for screening customers and beneficial owners and for filtering transactional data
	Office of Foreign Assets Control (OFAC)	g
93 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
93 d	European Union Consolidated List (EU)	· · · · · · · · · · · · · · · · · · ·
		Used for screening customers and beneficial owners and for filtering transactional data
93 е	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
93 f	Other (angeity)	
331	Other (specify)	BBVA adheres to local AML screening requirements in the jurisdictions where it has presence.
94	Question removed	
95	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:	
95 a	Customer Data	
		Same day to 2 business days
95 b	Transactions	
		Same day to 2 business days
		and any to a business days

	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	Yes
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	No
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	See annexes for branches.
97 b	If appropriate, provide any additional information / context to the answers in this section.	#87: We have procedures to avoid prohibitions within jurisdictions where we have presence and from EU, UN, OFAC and HMT, but cannot prevent local prohibitions in the rest of jurisdictions where our correspondent banks are established. #96: Repr. office in Cuba with no banking activity, only institutional relations.

44 TD	AINING & EDUCATION	
	AINING & EDUCATION	
98	Does the Entity provide mandatory training, which includes :	
98 a	Identification and reporting of transactions to government authorities	Yes
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
98 e	Conduct and Culture	Yes
99	Is the above mandatory training provided to :	
99 a	Board and Senior Committee Management	Yes
99 b	1st Line of Defence	Yes
99 с	2nd Line of Defence	Yes
99 d	3rd Line of Defence	Yes
99 e	3rd parties to which specific FCC activities have been outsourced	Yes
99 f	Non-employed workers (contractors/consultants)	Yes
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	Yes
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
102 b	If appropriate, provide any additional information / context to the answers in this section.	

12. QU	2. QUALITY ASSURANCE /COMPLIANCE TESTING		
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	Yes	
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	Yes	
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	Yes	
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
105 b	If appropriate, provide any additional information / context to the answers in this section.		

13. AU	13. AUDIT		
106			
100	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 and Sanctions policies and practices on a regular basis?	Yes	
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:		
107 a	Internal Audit Department	Component based reviews	
107 b	External Third Party	Yearly	
108	Does the internal audit function or other independent third party cover the following areas:		
108 a	AML, CTF & Sanctions policy and procedures	Yes	
108 b	KYC / CDD / EDD and underlying methodologies	Yes	
108 c	Transaction Monitoring	Yes	
108 d	Transaction Screening including for sanctions	Yes	
108 e	Name Screening & List Management	Yes	
108 f	Training & Education	Yes	
108 g	Technology	Yes	
108 h	Governance	Yes	
108 i	Reporting/Metrics & Management Information	Yes	
108 j	Suspicious Activity Filing	Yes	
108 k	Enterprise Wide Risk Assessment	Yes	
108 I	Other (specify)		
109	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes	
110	Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches	Yes	
110 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
110 b	If appropriate, provide any additional information / context to the answers in this section.		

Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2020 (CBDDQ V1.3)
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)

BANCO BILBAO VIZCAYA ARGENTARIA, S.A. 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 CBODQ will be kept current and will be updated no less frequently than on an annual basis.

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

i, ESTHER GALIANA _ (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.

1, EDUARDO GARDE _ (MLRO or equivalent), certify that I have read and understood this declaration, that the enswers 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.

July HHL, 2022

JULY 416 2022

the Wolfsberg Group

Financial Institution Name:

Banco Bilbao Vizcaya Argentaria, S.A.

Hong Kong

Location (Country):

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer
1. ENT	TTY & OWNERSHIP	
1	Full Legal Name	
2	Append a list of foreign branches which are covered by this questionnaire	Hong Kong
3	Full Legal (Registered) Address	Unit 9507, Level 95, International Commerce Centre, One Austin Road West, Kowloon, Hong Kong
ı	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/ establishment	The Hong Kong Branch (under the former name of Banco Exterior de Espana, S.A.) was established in 1985. After several mergers with some Spanish banks thereafter, the name was changed to Banco Bilbao Vizcaya Argentaria, S.A. in 2000.
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	
В	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	
Ва	If Y, provide the name of the relevant branch/es which operate under an OBL	
)	Name of primary financial regulator / supervisory authority	Hong Kong Monetary Authority

10	Decride Land Catiful Identifies (LED) if evallable	T
10	Provide Legal Entity Identifier (LEI) if available	
11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	
12	Jurisdiction of licensing authority and regulator of ultimate parent	
13	Select the business areas applicable to the Entity	
13 a	Retail Banking	No V
13 b	Private Banking / Wealth Management	No 🔻
13 c	Commercial Banking	
13 d	Transactional Banking	
13 e	Investment Banking	
13 f	Financial Markets Trading	
13 g	Securities Services / Custody	
13 h	Broker / Dealer	
13 i	Multilateral Development Bank	
13 j	Other	
14	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided.)	
14 a	If Y, provide the top five countries where the non- resident customers are located.	
15	Select the closest value:	
15 a	Number of employees	51-200
15 b	Total Assets	
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	· · · · · · · · · · · · · · · · · · ·
16 b	If appropriate, provide any additional information / context to the answers in this section.	

	DUCTS & SERVICES	
17	Does the Entity offer the following products and services:	
17 a	Correspondent Banking	
17 a1	lf Y	
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?	No
17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?	No
17 a4	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	No
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?	
17 a6	Does the Entity allow downstream relationships with Foreign Banks?	
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	No
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?	
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?	No
17 b	Private Banking (domestic & international)	No
17 c	Trade Finance	
17 d	Payable Through Accounts	
17 e	Stored Value Instruments	No
17 f	Cross Border Bulk Cash Delivery	-
17 g	Domestic Bulk Cash Delivery	
17 h	International Cash Letter	
17 i	Remote Deposit Capture	
17 j	Virtual /Digital Currencies	
17 k	Low Price Securities	
17 I	Hold Mail	No
17 m	Cross Border Remittances	
17 n	Service to walk-in customers (non-account holders)	No T
17 o	Sponsoring Private ATMs	
17 р	Other high risk products and services identified by the Entity	
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	
8 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
8 b	If appropriate, provide any additional information / context to the answers in this section.	Q17a5 - BBVA Hong Kong provides correspondent banking services only to BBVA Head Office, few branches and subsidiary banks mainly in HKD and RMB currencies.

2 A B B B	CTE & CANCTIONS PROCESSING	
3. AIVIL	, CTF & SANCTIONS PROGRAMME	
19	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
19 a	Appointed Officer with sufficient experience/expertise	
19 b	Cash Reporting	
19 с	CDD	
19 d	EDD	
19 e	Beneficial Ownership	
19 f	Independent Testing	
19 g	Periodic Review	
19 h	Policies and Procedures	
19 i	Risk Assessment	
19 j	Sanctions	
19 k	PEP Screening	
19 I	Adverse Information Screening	
19 m	Suspicious Activity Reporting	
19 n	Training and Education	
19 o	Transaction Monitoring	
20	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	Less than 10
21	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	
22	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	
23	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	
23 а	If Y, provide further details	
24	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	4
24 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
24 b	If appropriate, provide any additional information / context to the answers in this section.	

4. AN	TI BRIBERY & CORRUPTION	
25	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	
26	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	
27	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	
28	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	
29	Is the Entity's ABC programme applicable to:	
30	Does the Entity have a global ABC policy that:	
30 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	
30 b	Includes enhanced requirements regarding interaction with public officials?	
30 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	
32	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	
33	Does the Entity perform an Enterprise Wide ABC risk assessment?	
33 a	If Y select the frequency	
34	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	
35	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
35 a	Potential liability created by intermediaries and other third-party providers as appropriate	
35 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	
35 с	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	
35 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	
35 e	Changes in business activities that may materially increase the Entity's corruption risk	
36	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	

37	Does the Entity provide mandatory ABC training to:	
37 a	Board and senior Committee Management	
37 b	1st Line of Defence	
37 с	2nd Line of Defence	
37 d	3rd Line of Defence	
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	
37 f	Non-employed workers as appropriate (contractors/consultants)	
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
39 b	If appropriate, provide any additional information / context to the answers in this section.	

	, CTF & SANCTIONS POLICIES & PROCE	DURES
40	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to	
	reasonably prevent, detect and report:	
40 a	Money laundering	
40 b	Terrorist financing	
40 с	Sanctions violations	
41	Are the Entity's policies and procedures updated at least annually?	
42	Are the Entity's policies and procedures gapped against/compared to:	
42 a	US Standards	
42 a1	If Y, does the Entity retain a record of the results?	
42 b	EU Standards	
42 b1	If Y, does the Entity retain a record of the results?	
43	Does the Entity have policies and procedures that:	
43 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	
43 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	
43 с	Prohibit dealing with other entities that provide banking services to unlicensed banks	
43 d	Prohibit accounts/relationships with shell banks	
43 e	Prohibit dealing with another entity that provides services to shell banks	
43 f	Prohibit opening and keeping of accounts for Section 311 designated entities	
43 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	
43 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	
43 i	Define escalation processes for financial crime risk issues	
43 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	
43 k	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	
43 I	Outline the processes regarding screening for sanctions, PEPs and negative media	
43 m	Outline the processes for the maintenance of internal "watchlists"	
44	Has the Entity defined a risk tolerance statement or similar document which defines a risk	
45	boundary around their business? Does the Entity have a record retention	
45 a	procedures that comply with applicable laws? If Y, what is the retention period?	
46	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	
46 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
46 b	If appropriate, provide any additional information / context to the answers in this section.	

47	Does the Entity's AML & CTF EWRA cover the	
	inherent risk components detailed below:	
47 a	Client	
47 b	Product	
47 с	Channel	
47 d	Geography	
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	
48 b	Customer Due Diligence	
48 c	PEP Identification	
48 d	Transaction Screening	
48 e	Name Screening against Adverse Media & Negative News	
48 f	Training and Education	
48 g	Governance	
48 h	Management Information	
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	
50 b	Product	
50 c	Channel	
50 d	Geography	

Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
Customer Due Diligence	
Transaction Screening	
Name Screening	·
List Management	
Training and Education	
Governance	
Management Information	
Has the Entity's Sanctions EWRA been completed in the last 12 months?	
If N, provide the date when the last Sanctions EWRA was completed.	
Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT 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.	
	controls effectiveness components detailed below: Customer Due Diligence Transaction Screening Name Screening List Management Training and Education Governance Management Information Has the Entity's Sanctions EWRA been completed in the last 12 months? If N, provide the date when the last Sanctions EWRA was completed. Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT 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.

54	Does the Entity verify the identity of the	
	customer?	
55	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	
56	Which of the following does the Entity gather	
	and retain when conducting CDD? Select all that	
	apply:	
56 a	Ownership structure	
56 b	Customer identification	
56 c	Expected activity	
56 d	Nature of business/employment	
56 e	Product usage	
56 f	Purpose and nature of relationship	
56 g	Source of funds	
56 h	Source of wealth	
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	
57 a1	Are ultimate beneficial owners verified?	
57 b	Authorised signatories (where applicable)	
57 c	Key controllers	
57 d	Other relevant parties	
58	What is the Entity's minimum (lowest) threshold	
	applied to beneficial ownership identification?	
59	Does the due diligence process result in	
	customers receiving a risk classification?	

60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60 a	Product Usage	
60 b	Geography	
60 c	Business Type/Industry	
60 d	Legal Entity type	
60 e	Adverse Information	
60 f	Other (specify)	
61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	
62	If Y, is this at:	
62 a	Onboarding	
62 b	KYC renewal	
62 c	Trigger event	
63	What is the method used by the Entity to screen for adverse media / negative news?	
64	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
65	If Y, is this at:	
65 a	Onboarding	
65 b	KYC renewal	
65 c	Trigger event	
66	What is the method used by the Entity to screen PEPs?	
67	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?	
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	
68 b	Trigger event	
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	

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	
70 a	FCC programme? Non-account customers	
70 b	Non-resident customers	
70 c	Shell banks	
70 d	MVTS/ MSB customers	
70 e	PEPs	
70 f	PEP Related	
70 g	PEP Close Associate	
70 h	Correspondent Banks	
70 h1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	
70 i	Arms, defense, military	
70 j	Atomic power	
70 k	Extractive industries	
70 I	Precious metals and stones	
70 m	Unregulated charities	
70 n	Regulated charities	
70 o	Red light business / Adult entertainment	
70 p	Non-Government Organisations	
70 q	Virtual currencies	
70 r	Marijuana	
70 s	Embassies/Consulates	
70 t	Gambling	
70 u	Payment Service Provider	
70 v	Other (specify)	
71	If restricted, provide details of the restriction	
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	A
73 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
73 b	If appropriate, provide any additional information / context to the answers in this section.	

74	Door the Catity have risk based policies	
74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	
75	What is the method used by the Entity to monitor transactions for suspicious activities?	
76	If manual or combination selected, specify what type of transactions are monitored manually	
77	Does the Entity have regulatory requirements to report suspicious transactions?	
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
79 b	If appropriate, provide any additional information / context to the answers in this section.	

80	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	
81	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
81 a	FATF Recommendation 16	
81 b	Local Regulations	
81 b1	Specify the regulation	Anti-Money Laundering and Counter-Terrorist Financing Ordinance, Cap. 615
81 c	If N, explain	
82	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	
83	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	
84	Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?	
85	Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	
85 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
85 b	If appropriate, provide any additional information / context to the answers in this section.	

10. S/	ANCTIONS	
86	Does the Entity have a Sanctions Policy	
	approved by management regarding	
	compliance with sanctions law applicable to the	
	Entity, including with respect its business	
	conducted with, or through accounts held at	
	foreign financial institutions?	
87	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)?	
88		Alta and an analysis and an an
00	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?	
89	Does the Entity screen its customers, including	
	beneficial ownership information collected by the	
	Entity, during onboarding and regularly	
	thereafter against Sanctions Lists?	
90	What is the method used by the Entity?	
91	Does the Entity screen all sanctions relevant	
٠.	data, including at a minimum, entity and location	
	information, contained in cross border	
	transactions against Sanctions Lists?	
92	What is the method used by the Entity?	
93	Select the Sanctions Lists used by the Entity in	
	its sanctions screening processes:	
93 a	Consolidated United Nations Security Council	
93 a		
	Sanctions List (UN)	
93 b	United States Department of the Treasury's	
	Office of Foreign Assets Control (OFAC)	
93 c	Office of Financial Sanctions Implementation	
1.000	HMT (OFSI)	
93 d	European Union Consolidated List (EU)	
30 u	Lar opean official consolidated List (LO)	
00	11.4	
93 e	Lists maintained by other G7 member countries	
		MOVIEMENT OF THE STATE OF THE S
93 f	Other (specify)	
94	Question removed	
95	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:	
95 a		
90 d	Customer Data	
95 b	Transactions	

96	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	

98	Does the Entity provide mandatory training, which includes :	
98 a	Identification and reporting of transactions to government authorities	
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	
98 e	Conduct and Culture	
99	Is the above mandatory training provided to :	
99 a	Board and Senior Committee Management	
99 b	1st Line of Defence	
99 c	2nd Line of Defence	
99 d	3rd Line of Defence	
99 e	3rd parties to which specific FCC activities have been outsourced	
99 f	Non-employed workers (contractors/consultants)	
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	
101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
102 b	If appropriate, provide any additional information / context to the answers in this section.	

103	Are the Entity's KYC processes and documents	
103	subject to quality assurance testing?	
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
105 b	If appropriate, provide any additional information / context to the answers in this section.	

13. AU	IDIT	
106	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 and Sanctions policies and practices on a regular basis?	
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:	
107 a	Internal Audit Department	
107 b	External Third Party	
108	Does the internal audit function or other independent third party cover the following areas:	
108 a	AML, CTF & Sanctions policy and procedures	
108 b	KYC / CDD / EDD and underlying methodologies	
108 c	Transaction Monitoring	
108 d	Transaction Screening including for sanctions	
108 e	Name Screening & List Management	
108 f	Training & Education	
108 g	Technology	
108 h	Governance	
108 i	Reporting/Metrics & Management Information	
108 j	Suspicious Activity Filing	
108 k	Enterprise Wide Risk Assessment	
108 I	Other (specify)	
109	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	
110	Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches	
110 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110 b	If appropriate, provide any additional information / context to the answers in this section.	

<u>Declaration Statement</u>	
	ice Questionnaire 2020 (CBDDQ V1.3) of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of obal Head of Financial Crimes Compliance OR equivalent)
Banco Bilbao Vizcaya Argentaria, S.A.	(Financial Institution name) is fully committed to the fight against financial crime and makes
every effort to remain in full compliance with all applic	able 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 impo legal and regulatory obligations.	rtance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its
The Financial Institution recognises the importance of standards.	transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these
standards. The Financial Institution further certifies it complies wi	transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these th / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles I be kept current and will be updated no less frequently than on an annual basis.
standards. The Financial Institution further certifies it complies wi	th / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles less that the wolfsberg trade Finance Principles less that current and will be updated no less frequently than on an annual basis.
standards. The Financial Institution further certifies it complies wi The information provided in thisWolfsberg CBDDQ wil	th / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles in the kept current and will be updated no less frequently than on an annual basis.
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the Wolfsberg Group

Financial Institution Name:

Banco Bilbao Vizacaya Aragentaria S.A. French Branch

French Branch

Location (Country):

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer
1. ENTI	TY & OWNERSHIP	
1	Full Legal Name	Banco Bilbao Vizacaya Aragentaria S.A. French Branch
2	Append a list of foreign branches which are covered by this questionnaire	French Branch
3	Full Legal (Registered) Address	29 Avenue de l'Opéra 75001 Paris
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/ establishment	1902
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	Name of primary financial regulator / supervisory authority	Banque de France / ACPR (Autorité de Contrôle Prudentiel et de Résolution)

10	Provide Legal Entity Identifier (LEI) if available	894500U247KEMA0HHP26	
11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)		
12	Jurisdiction of licensing authority and regulator of ultimate parent		
13	Select the business areas applicable to the Entity		
13 a	Retail Banking	No	-
13 b	Private Banking / Wealth Management	No	▼
13 c	Commercial Banking		Lance Lance
13 d	Transactional Banking		
13 e	Investment Banking		
13 f	Financial Markets Trading		
13 g	Securities Services / Custody	No	-
13 h	Broker / Dealer		leads
13 i	Multilateral Development Bank	No	-
13 j	Other		<u></u>
14 14 a	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided.) If Y, provide the top five countries where the non-		
	resident customers are located.		
15	Select the closest value:		
15 a	Number of employees	51-200	·
15 b	Total Assets		(Access)
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches		
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
16 b	If appropriate, provide any additional information / context to the answers in this section.		

AN ADVANCED TO THE	DUCTS & SERVICES		
17	Does the Entity offer the following products and services:		
17 a	Correspondent Banking		
17 a1	If Y		
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?	No	*
17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?		
17 a4	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?		
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?		
17 a6	Does the Entity allow downstream relationships with Foreign Banks?		
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?		
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	No	•
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?		,311
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?		
17 b	Private Banking (domestic & international)		
17 с	Trade Finance		
17 d	Payable Through Accounts		
17 e	Stored Value Instruments	No	-
17 f	Cross Border Bulk Cash Delivery		lane.
17 g	Domestic Bulk Cash Delivery		
17 h	International Cash Letter		
17 i	Remote Deposit Capture		
17 j	Virtual /Digital Currencies		
17 k	Low Price Securities		
17 1	Hold Mail	No	-
17 m	Cross Border Remittances		Land Land
17 n	Service to walk-in customers (non-account holders)	No	
17 o	Sponsoring Private ATMs		Loos
17 p	Other high risk products and services identified by the Entity		4 (
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches		
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
18 b	If appropriate, provide any additional information / context to the answers in this section.		

CASSAGE NEWSTAN	CTF & SANCTIONS PROGRAMME	
19	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
19 a	Appointed Officer with sufficient experience/expertise	
19 b	Cash Reporting	
19 с	CDD	
19 d	EDD	
19 e	Beneficial Ownership	
19 f	Independent Testing	
19 g	Periodic Review	
19 h	Policies and Procedures	
19 i	Risk Assessment	
19 j	Sanctions	
19 k	PEP Screening	
19 I	Adverse Information Screening	
19 m	Suspicious Activity Reporting	
19 n	Training and Education	
19 o	Transaction Monitoring	
20	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	Less than 10
21	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	
22	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	
23	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	
23 a	If Y, provide further details	
24	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	
24 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
24 b	If appropriate, provide any additional information / context to the answers in this section.	

25	TI BRIBERY & CORRUPTION [Has the Entity documented policies and]	
20	procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	
26	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	
27	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	
28	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	
29	Is the Entity's ABC programme applicable to:	
30	Does the Entity have a global ABC policy that:	
30 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	
30 b	Includes enhanced requirements regarding interaction with public officials?	
30 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	
32	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	
33	Does the Entity perform an Enterprise Wide ABC risk assessment?	
33 a	If Y select the frequency	
34	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	
35	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
35 a	Potential liability created by intermediaries and other third-party providers as appropriate	
35 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	No -
35 с	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	
35 d	Comuption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	
35 e	Changes in business activities that may materially increase the Entity's corruption risk	No 🔻
36	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	

Does the Entity provide mandatory ABC training to:		
Board and senior Committee Management		
1st Line of Defence		
2nd Line of Defence		
3rd Line of Defence		
3rd parties to which specific compliance activities subject to ABC risk have been outsourced	No	•
Non-employed workers as appropriate (contractors/consultants)		
Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?		
Confirm that all responses provided in the above Section Anti Bribery & Corruption 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.		
	to: Board and senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Non-employed workers as appropriate (contractors/consultants) Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities? Confirm that all responses provided in the above Section Anti Bribery & Corruption 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.	to: Board and senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence 3rd parties to which specific compliance activities subject to ABC risk have been outsourced Non-employed workers as appropriate (contractors/consultants) Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities? Confirm that all responses provided in the above Section Anti Bribery & Corruption 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.

A STATE OF THE PARTY OF THE PAR	, CTF & SANCTIONS POLICIES & PROCED	
10	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
10 a	Money laundering	
10 b	Terrorist financing	
10 c	Sanctions violations	
11	Are the Entity's policies and procedures updated at least annually?	
12	Are the Entity's policies and procedures gapped against/compared to:	
12 a	US Standards	
42 a1	If Y, does the Entity retain a record of the results?	
42 b	EU Standards	
42 b1	If Y, does the Entity retain a record of the results?	
43	Does the Entity have policies and procedures	
43 a	that: Prohibit the opening and keeping of anonymous	
43 b	and fictitious named accounts Prohibit the opening and keeping of accounts for	
43 c	unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide	
	banking services to unlicensed banks	
43 d	Prohibit accounts/relationships with shell banks	
43 e	Prohibit dealing with another entity that provides services to shell banks	
43 f	Prohibit opening and keeping of accounts for Section 311 designated entities	
43 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	
43 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	
43 i	Define escalation processes for financial crime risk issues	
43 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	
43 k	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	
43	Outline the processes regarding screening for sanctions, PEPs and negative media	
43 m	Outline the processes for the maintenance of internal "watchlists"	
44	Has the Entity defined a risk tolerance statement or similar document which defines a risk	
45	Does the Entity have a record retention	
45 a	procedures that comply with applicable laws? If Y, what is the retention period?	
46	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are	
46 a	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.	
46 b	If appropriate, provide any additional information / context to the answers in this section.	

	CTF & SANCTIONS RISK ASSESSMENT	
47	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
47 a	Client	
47 b	Product	
47 с	Channel	
47 d	Geography	
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	
48 b	Customer Due Diligence	
48 c	PEP Identification	
48 d	Transaction Screening	
48 e	Name Screening against Adverse Media & Negative News	
48 f	Training and Education	
48 g	Governance	
48 h	Management Information	
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	
50 b	Product	
50 с	Channel	
50 d	Geography	

Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:		
Customer Due Diligence		
Transaction Screening		
Name Screening		
List Management		
Training and Education		
Governance		
Management Information		
Has the Entity's Sanctions EWRA been completed in the last 12 months?		
If N, provide the date when the last Sanctions EWRA was completed.		
Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	No	-
If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	We are just a branch office and cannot answer for the other LE's in the group	
If appropriate, provide any additional information / context to the answers in this section.		
	controls effectiveness components detailed below: Customer Due Diligence Transaction Screening Name Screening List Management Training and Education Governance Management Information Has the Entity's Sanctions EWRA been completed in the last 12 months? If N, provide the date when the last Sanctions EWRA was completed. Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT 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.	controls effectiveness components detailed below: Customer Due Diligence Transaction Screening Name Screening List Management Training and Education Governance Management Information Has the Entity's Sanctions EWRA been completed in the last 12 months? If N, provide the date when the last Sanctions EWRA was completed. Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT 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

54	Does the Entity verify the identity of the	
	customer?	
55	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	
56	Which of the following does the Entity gather	
00	and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	
56 b	Customer identification	
56 с	Expected activity	
56 d	Nature of business/employment	
56 e	Product usage	
56 f	Purpose and nature of relationship	
56 g	Source of funds	
56 h	Source of wealth	
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	
57 a1	Are ultimate beneficial owners verified?	
57 b	Authorised signatories (where applicable)	
57 c	Key controllers	
57 d	Other relevant parties	
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	
59	Does the due diligence process result in customers receiving a risk classification?	

60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60 a	Product Usage	
60 b	Geography	
60 c	Business Type/Industry	
60 d	Legal Entity type	
60 e	Adverse Information	
60 f	Other (specify)	
61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	
62	If Y, is this at:	
62 a	Onboarding	
62 b	KYC renewal	
62 c	Trigger event	
63	What is the method used by the Entity to screen for adverse media / negative news?	
64	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
65	If Y, is this at:	
65 a	Onboarding	
65 b	KYC renewal	
65 с	Trigger event	
66	What is the method used by the Entity to screen PEPs?	
67	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?	
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	
68 b	Trigger event	
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	

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		
70 a	FCC programme? Non-account customers	A 150 A	
	V12.73173.4374	Do not have this category of customer or industry	
70 b	Non-resident customers		
70 c	Shell banks		*
70 d	MVTS/ MSB customers	Do not have this category of customer or industry	•
70 e	PEPs		
70 f	PEP Related		
70 g	PEP Close Associate		
70 h	Correspondent Banks		
70 h1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?		
70 i	Arms, defense, military	Do not have this category of customer or industry	•
70 j	Atomic power	Do not have this category of customer or industry	~
70 k	Extractive industries		
70 I	Precious metals and stones	Do not have this category of customer or industry	-
70 m	Unregulated charities	Do not have this category of customer or industry	·
70 n	Regulated charities	Do not have this category of customer or industry	·
70 o	Red light business / Adult entertainment	Do not have this category of customer or industry	-
70 p	Non-Government Organisations	Do not have this category of customer or industry	·
70 q	Virtual currencies	Do not have this category of customer or industry	·
70 r	Marijuana	Do not have this category of customer or industry	*
70 s	Embassies/Consulates	Do not have this category of customer or industry	•
70 t	Gambling	Do not have this category of customer or industry	•
70 u	Payment Service Provider	Do not have this category of customer or industry	Ţ
70 v	Other (specify)		ase
71	If restricted, provide details of the restriction		
72	Does the Entity perform an additional control or quality review on clients subject to EDD?		
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches		
73 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to		
73 b	If appropriate, provide any additional information / context to the answers in this section.	We identify beneficial owners according to the requirements of french legislation	

74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	
75	What is the method used by the Entity to monitor transactions for suspicious activities?	
76	If manual or combination selected, specify what type of transactions are monitored manually	
77	Does the Entity have regulatory requirements to report suspicious transactions?	
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
79 b	If appropriate, provide any additional information / context to the answers in this section.	

80	Does the Entity adhere to the Wolfsberg Group	
	Payment Transparency Standards?	
81	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
81 a	FATF Recommendation 16	
81 b	Local Regulations	
81 b1	Specify the regulation	
81 c	If N, explain	
82	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	
83	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	
84	Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?	
85	Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	
85 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
85 b	If appropriate, provide any additional information / context to the answers in this section.	

	NCTIONS	
86	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions?	
87	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)?	
88	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?	
89	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	
90	What is the method used by the Entity?	
91	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	
92	What is the method used by the Entity?	
93	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
93 a	Consolidated United Nations Security Council Sanctions List (UN)	
93 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	
93 с	Office of Financial Sanctions Implementation HMT (OFSI)	
93 d	European Union Consolidated List (EU)	
93 e	Lists maintained by other G7 member countries	
93 f	Other (specify)	
94	Question removed	
95	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:	
95 a	Customer Data	
95 b	Transactions	

96	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	

98	Does the Entity provide mandatory training, which includes :		
98 a	Identification and reporting of transactions to government authorities		
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered		
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations		
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations		
98 e	Conduct and Culture		
99	Is the above mandatory training provided to :		
99 a	Board and Senior Committee Management		
99 b	1st Line of Defence		
99 с	2nd Line of Defence		
99 d	3rd Line of Defence		
99 e	3rd parties to which specific FCC activities have been outsourced		
99 f	Non-employed workers (contractors/consultants)		
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?		
101	Does the Entity provide customised training for AML, CTF and Sanctions staff?		
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	No	,
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	We are just a branch office and cannot answer for the other LE's in the group	
102 b	If appropriate, provide any additional information / context to the answers in this section.		

103	Are the Entity's KYC processes and documents subject to quality assurance testing?		
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?		
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	No	
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	We are just a branch office and cannot answer for the other LE's in the group	
105 b	If appropriate, provide any additional information / context to the answers in this section.		

13. AU		
106	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 and Sanctions policies and practices on a regular basis?	
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:	
107 a	Internal Audit Department	
107 b	External Third Party	
108	Does the internal audit function or other independent third party cover the following areas:	
108 a	AML, CTF & Sanctions policy and procedures	
108 b	KYC / CDD / EDD and underlying methodologies	
108 c	Transaction Monitoring	
108 d	Transaction Screening including for sanctions	
108 e	Name Screening & List Management	
108 f	Training & Education	
108 g	Technology	
108 h	Governance	
108 i	Reporting/Metrics & Management Information	
108 j	Suspicious Activity Filing	
108 k	Enterprise Wide Risk Assessment	
108 I	Other (specify)	
109	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	
110	Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches	
110 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110 b	If appropriate, provide any additional information / context to the answers in this section.	

Declaration Statement Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2020 (CBDDQ V1.3) Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevent Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent) Banco Bilbao Vizacya Argentaria S.A (Financial Institution name) is fully committed to the fight against financial crime and make 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 busi The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect i legal and regulatory obligations. The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is costandards. The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg The information provided in thisWolfsberg CBDDQ will be kept current and will be updated no less frequently than on an annual basis. The Financial Institution commits to file accurate supplemental information on a timely basis.	is iness and holds accounts. Its reputation and to meet its immitted to adopting these
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The Financial Institution commits to file accurate supplemental information on a timely basis.	erg Trade Finance Principles
ı, (Global Head of Correspondent Banking or equivalent), certify that I have read and undo	
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 institution.	benait of the Financial
Luis López González (MLRO 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 Institut	
18/07/2022 (Signature & Date)	
Togulario a soloy	
(Signature & Date)	
(13	

the Wolfsberg Group

Financial Institution Name:	
Location (Country) :	

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer
1. ENT	TY & 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	
0 a i	symbol	
6 b	Member Owned/ Mutual	
6 c	Government or State Owned by 25% or more	
0.0	Government of State Owned by 25% of filore	
6 d	Privately Owned	
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
	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	Name of primary financial regulator / supervisory	
	authority	
L	Ļ	

10	Provide Legal Entity Identifier (LEI) if available	
11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	
12	Jurisdiction of licensing authority and regulator of ultimate parent	
13	Select the business areas applicable to the Entity	
13 a	Retail Banking	
13 b	Private Banking / Wealth Management	
13 c	Commercial Banking	
13 d	Transactional Banking	
13 e	Investment Banking	
13 f	Financial Markets Trading	
13 g	Securities Services / Custody	
13 h	Broker / Dealer	
13 i	Multilateral Development Bank	
13 ј	Other	
14	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided.)	
14 a	If Y, provide the top five countries where the non-resident customers are located.	
15	Select the closest value:	
15 a	Number of employees	
15 b	Total Assets	
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
16 b	If appropriate, provide any additional information / context to the answers in this section.	

2. PROI	DUCTS & SERVICES	
17	Does the Entity offer the following products and	
	services:	
17 a	Correspondent Banking	
17 a1	If Y	
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?	
17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?	
17 a4	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?	
17 a6	Does the Entity allow downstream relationships with Foreign Banks?	
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?	
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?	
17 b	Private Banking (domestic & international)	
17 c	Trade Finance	
17 d	Payable Through Accounts	
17 e	Stored Value Instruments	
17 f	Cross Border Bulk Cash Delivery	
17 g	Domestic Bulk Cash Delivery	
17 h	International Cash Letter	
17 i	Remote Deposit Capture	
17 j	Virtual /Digital Currencies	
17 k	Low Price Securities	
17 I	Hold Mail	
17 m	Cross Border Remittances	
17 n	Service to walk-in customers (non-account holders)	
17 o	Sponsoring Private ATMs	
17 p	Other high risk products and services identified by the Entity	
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18 b	If appropriate, provide any additional information / context to the answers in this section.	

3. AML,	CTF & SANCTIONS PROGRAMME	
19	Does the Entity have a programme that sets	
	minimum AML, CTF and Sanctions standards regarding the following components:	
19 a	Appointed Officer with sufficient experience/expertise	
19 b	Cash Reporting	
19 с	CDD	
19 d	EDD	
19 e	Beneficial Ownership	
19 f	Independent Testing	
19 g	Periodic Review	
19 h	Policies and Procedures	
19 i	Risk Assessment	
19 ј	Sanctions	
19 k	PEP Screening	
19 I	Adverse Information Screening	
19 m	Suspicious Activity Reporting	
19 n	Training and Education	
19 o	Transaction Monitoring	
20	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	
21	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	
22	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	
23	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	
23 a	If Y, provide further details	
24	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	
24 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
24 b	If appropriate, provide any additional information / context to the answers in this section.	

4. ANTI	BRIBERY & CORRUPTION	
25	Has the Entity documented policies and	
23	procedures consistent with applicable ABC	
	regulations and requirements to [reasonably]	
	prevent, detect and report bribery and	
	corruption?	
26	Does the Entity have an enterprise wide	
20	programme that sets minimum ABC standards?	
27	Has the Entity appointed a designated officer or	
21	officers with sufficient experience/expertise	
	responsible for coordinating the ABC	
	programme?	
28	Does the Entity have adequate staff with	
	appropriate levels of experience/expertise to	
	implement the ABC programme?	
29	Is the Entity's ABC programme applicable to:	
30	Does the Entity have a global ABC policy that:	
30 a	Prohibits the giving and receiving of bribes?	
1	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	
30 b	Includes enhanced requirements regarding	
	interaction with public officials?	
30 c	Includes a prohibition against the falsification of	
30 0	books and records (this may be within the ABC	
	policy or any other policy applicable to the Legal	
	Entity)?	
31		
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	
32	Does the Entity's Board or Senior Management	
	Committee receive regular Management	
	Information on ABC matters?	
33	Does the Entity perform an Enterprise Wide	
	ABC risk assessment?	
33 a	If Y select the frequency	
34	Does the Entity have an ABC residual risk rating	
	that is the net result of the controls effectiveness	
	and the inherent risk assessment?	
35	Does the Entity's ABC EWRA cover the inherent	
	risk components detailed below:	
05 -	Detected Paker and the Control of th	
35 a	Potential liability created by intermediaries and	
L	other third-party providers as appropriate	
35 b	Corruption risks associated with the countries	
	and industries in which the Entity does business,	
	directly or through intermediaries	
35 c	Transactions, products or services, including	
1	those that involve state-owned or state-	
	controlled entities or public officials	
35 d	Corruption risks associated with gifts and	
-	hospitality, hiring/internships, charitable	
	donations and political contributions	
35 e	Changes in business activities that may	
33 C	materially increase the Entity's corruption risk	
20		
36	Does the Entity's internal audit function or other	
	independent third party cover ABC Policies and	
	Procedures?	

37	Does the Entity provide mandatory ABC training to:	
37 a	Board and senior Committee Management	
37 b	1st Line of Defence	
37 с	2nd Line of Defence	
37 d	3rd Line of Defence	
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	
37 f	Non-employed workers as appropriate (contractors/consultants)	
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
39 b	If appropriate, provide any additional information / context to the answers in this section.	

	CTF & SANCTIONS POLICIES & PROCEI	JUKES
40	Has the Entity documented policies and	
	procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to	
	reasonably prevent, detect and report:	
40 a	Money laundering	
40 b	Terrorist financing	
40 с	Sanctions violations	
41	Are the Entity's policies and procedures updated	
40	at least annually?	
42	Are the Entity's policies and procedures gapped against/compared to:	
42 a	US Standards	
42 a1	If Y, does the Entity retain a record of the results?	
42 b	EU Standards	
42 b1	If Y, does the Entity retain a record of the results?	
43	Does the Entity have policies and procedures that:	
43 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	
43 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	
43 c	Prohibit dealing with other entities that provide	
43 d	banking services to unlicensed banks Prohibit accounts/relationships with shell banks	
43 e	Prohibit dealing with another entity that provides	
43 f	services to shell banks Prohibit opening and keeping of accounts for	
	Section 311 designated entities	
43 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio,	
43 h	bureaux de change or money transfer agents	
43 N	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	
43 i	Define escalation processes for financial crime risk issues	
43 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	
43 k	Specify how potentially suspicious activity	
	identified by employees is to be escalated and investigated	
43 I	Outline the processes regarding screening for sanctions, PEPs and negative media	
43 m	Outline the processes for the maintenance of internal "watchlists"	
44	Has the Entity defined a risk tolerance statement or similar document which defines a risk	
45	boundary around their business? Does the Entity have a record retention	
4E o	procedures that comply with applicable laws?	
45 a	If Y, what is the retention period?	
46	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	
46 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
46 b	If appropriate, provide any additional information	

6. AML	, CTF & SANCTIONS RISK ASSESSMENT	
47	Does the Entity's AML & CTF EWRA cover the	
**	inherent risk components detailed below:	
47 a	Client	
47 b	Product	
47 c	Channel	
47 d	Geography	
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	
48 b	Customer Due Diligence	
48 c	PEP Identification	
48 d	Transaction Screening	
48 e	Name Screening against Adverse Media & Negative News	
48 f	Training and Education	
48 g	Governance	
48 h	Management Information	
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	
50 b	Product	
50 с	Channel	
50 d	Geography	

51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
51 a	Customer Due Diligence	
51 b	Transaction Screening	
51 c	Name Screening	
51 d	List Management	
51 e	Training and Education	
51 f	Governance	
51 g	Management Information	
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	
52 a	If N, provide the date when the last Sanctions EWRA was completed.	
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53 b	If appropriate, provide any additional information / context to the answers in this section.	

. KYC	C, CDD and EDD	
54	Does the Entity verify the identity of the customer?	
55	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	
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	
56 b	Customer identification	
56 с	Expected activity	
56 d	Nature of business/employment	
56 e	Product usage	
56 f	Purpose and nature of relationship	
56 g	Source of funds	
56 h	Source of wealth	
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	
57 a1	Are ultimate beneficial owners verified?	
57 b	Authorised signatories (where applicable)	
57 с	Key controllers	
57 d	Other relevant parties	
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	
59	Does the due diligence process result in customers receiving a risk classification?	

60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60 a	Product Usage	
60 b	Geography	
60 c	Business Type/Industry	
60 d	Legal Entity type	
60 e	Adverse Information	
60 f	Other (specify)	
61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	
62	If Y, is this at:	
62 a	Onboarding	
62 b	KYC renewal	
62 c	Trigger event	
63	What is the method used by the Entity to screen for adverse media / negative news?	
64	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
65	If Y, is this at:	
65 a	Onboarding	
65 b	KYC renewal	
65 c	Trigger event	
66	What is the method used by the Entity to screen PEPs?	
67	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?	
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	
68 b	Trigger event	
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	

	Tenanda Pathala 12.1 1 1 1	
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?	
70 a	Non-account customers	
70 b	Non-resident customers	
70 B	Non-resident customers	
70 c	Shell banks	
70 d	MVTS/ MSB customers	
70 -	PEPs	
70 e	PEPS	
70 f	PEP Related	
70 g	PEP Close Associate	
70 h	Company deat Dealer	
70 N	Correspondent Banks	
70 h1	If EDD or EDD & restricted, does the EDD	
	assessment contain the elements as set out in	
	the Wolfsberg Correspondent Banking	
	Principles 2014?	
70 i	Arms, defense, military	
	,	
70 :	A 1 1	
70 j	Atomic power	
70 k	Extractive industries	
70 I	Precious metals and stones	
,,,,	1 recious metals and stones	
70 m	Unregulated charities	
70 n	Regulated charities	
	Ů	
70 o	Red light business / Adult entertainment	
700	Red light business / Adult entertainment	
70 p	Non-Government Organisations	
70 q	Virtual currencies	
70 r	Marijuana	
	Manjaana	
	5 1 1 10 11	
70 s	Embassies/Consulates	
70 t	Gambling	
	- I	
70 u	Payment Service Provider	
, o u	aymont Service i Tovider	
70 v	Other (specify)	
74	If we stated was tide date to 10 to 10 to 10 to 10	
71	If restricted, provide details of the restriction	
72	Does the Entity perform an additional control or	
12		
	quality review on clients subject to EDD?	
73	Confirm that all responses provided in the above	
	Section KYC, CDD and EDD are representative	
	of all the LE's branches	
73 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to	
	is at and the branen, os that the applies to	
1		
73 b	If appropriate, provide any additional information	
	/ context to the answers in this section.	
1	and decident	

8. MO	NITORING & REPORTING	
74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	
75	What is the method used by the Entity to monitor transactions for suspicious activities?	
76	If manual or combination selected, specify what type of transactions are monitored manually	
77	Does the Entity have regulatory requirements to report suspicious transactions?	
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
79 b	If appropriate, provide any additional information / context to the answers in this section.	

MENT TRANSPARENCY	
Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	
Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
FATF Recommendation 16	
Local Regulations	
Specify the regulation	
If N, explain	
Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	
Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	
Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?	
Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY 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.	
	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: FATF Recommendation 16 Local Regulations Specify the regulation If N, explain Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages? Does the Entity have controls to support the inclusion of required beneficiary information international payment messages? Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY 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.

10. SA	NCTIONS	
86	Does the Entity have a Sanctions Policy	
00	approved by management regarding	
	, , , , ,	
	compliance with sanctions law applicable to the	
	Entity, including with respect its business	
	conducted with, or through accounts held at	
	foreign financial institutions?	
87	Does the Entity have policies, procedures, or	
01	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)?	
88	Does the Entity have policies, procedures or	
00	' ''	
	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?	
89	Does the Entity screen its customers, including	
33		
	beneficial ownership information collected by the	
	Entity, during onboarding and regularly	
	thereafter against Sanctions Lists?	
90	What is the method used by the Entity?	
91	Does the Entity screen all sanctions relevant	
31		
	data, including at a minimum, entity and location	
	information, contained in cross border	
	transactions against Sanctions Lists?	
92	What is the method used by the Entity?	
	, , , , , , , , , , , , , , , , , , , ,	
93	Select the Sanctions Lists used by the Entity in	
	its sanctions screening processes:	
93 a	Consolidated United Nations Security Council	
00 u	Sanctions List (UN)	
93 b	United States Department of the Treasury's	
93 D		
	Office of Foreign Assets Control (OFAC)	
93 c	Office of Financial Sanctions Implementation	
	HMT (OFSI)	
93 d	European Union Consolidated List (EU)	
93 e	Lists maintained by other G7 member countries	
93 f	Other (specify)	
	'' ''	
94	Question removed	
95	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:	
05.0	, , , , , , , , , , , , , , , , , , ,	
95 a	Customer Data	
95 b	Transactions	

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ) V1.3

	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	

	AINING & EDUCATION	
98	Does the Entity provide mandatory training, which includes :	
98 a	Identification and reporting of transactions to government authorities	
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	
98 e	Conduct and Culture	
99	Is the above mandatory training provided to :	
99 a	Board and Senior Committee Management	
99 b	1st Line of Defence	
99 с	2nd Line of Defence	
99 d	3rd Line of Defence	
99 e	3rd parties to which specific FCC activities have been outsourced	
99 f	Non-employed workers (contractors/consultants)	
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	
101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
102 b	If appropriate, provide any additional information / context to the answers in this section.	

12. QU	ALITY ASSURANCE /COMPLIANCE TESTI	NG
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
105 b	If appropriate, provide any additional information / context to the answers in this section.	

13. AUE	DIT	
106	In addition to inspections by the government	
106		
	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 and Sanctions policies and	
	practices on a regular basis?	
107	How often is the Entity audited on its AML, CTF	
	& Sanctions programme by the following:	
107 a	Internal Audit Department	
107 b	External Third Party	
108	Does the internal audit function or other	
	independent third party cover the following	
	areas:	
108 a	AML, CTF & Sanctions policy and procedures	
100 a	Aivie, 611 & Sanctions policy and procedures	
108 b	KYC / CDD / EDD and underlying	
	methodologies	
108 c	Transaction Monitoring	
108 d	Transaction Screening including for sanctions	
	g and g and g	
108 e	Name Screening & List Management	
108 f	Training & Education	
.00 .	Training & Education	
108 g	Technology	
108 h	Governance	
108 i	Reporting/Metrics & Management Information	
400 :	Consistent Astrik Filips	
108 j	Suspicious Activity Filing	
108 k	Enterprise Wide Risk Assessment	
	Zine-price vide view vicecountri	
108 I	Other (specify)	
1001	Other (Specify)	
109	Are adverse findings from internal & external	
	audit tracked to completion and assessed for	
	adequacy and completeness?	
110	Confirm that all responses provided in the above	
-	section, AUDIT are representative of all the LE's	
	branches	
110 a	If N, clarify which questions the difference/s	
1 1 U a	relate to and the branch/es that this applies to.	
	Totale to and the braneness that this applies to.	
110 b	If appropriate, provide any additional information	
	/ context to the answers in this section.	

Declaration Statement
Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2020 (CBDDQ V1.3) 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)
(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 thisWolfsberg CBDDQ will be kept current and will be updated no less frequently than on an annual basis.
The Financial Institution commits to file accurate supplemental information on a timely basis.
I,
I, (MLRO 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.
(Signature & Date)
(Signature & Date)

the Wolfsberg Group

Financial Institution Name:	BANCO BILBAO VIZCAYA ARGENTARIA, S.A.
Location (Country) :	TAIWAN

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer
1. ENT	TY & OWNERSHIP	Filedia
1	Full Legal Name	
		BANCO BILBAO VIZCAYA ARGENTARIA, S.A., TAIWAN BRANCH
2	Append a list of foreign branches which are covered by this questionnaire	TAIWAN
3	Full Legal (Registered) Address	Unit D, Level 45, Taipei 101 Tower, No.7 Xinyi Rd, Sec 5, Taipei City11049, Taiwan, ROC
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/ establishment	11/23/2011
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/ Mutual	
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) ?	
B a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Name of primary financial regulator / supervisory authority	Financial Supervisory Committee (FSC)

10	Provide Legal Entity Identifier (LEI) if available	
11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	
12	Jurisdiction of licensing authority and regulator of ultimate parent	TAIWAN
13	Select the business areas applicable to the Entity	
13 a	Retail Banking	Na
13 b	Private Banking / Wealth Management	No
13 c	Commercial Banking	
13 d	Transactional Banking	
13 e	Investment Banking	No
13 f	Financial Markets Trading	
13 g	Securities Services / Custody	No
13 h	Broker / Dealer	No
13 i	Multilateral Development Bank	
13 j	Other	
14	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided.)	
14 a	If Y, provide the top five countries where the non- resident customers are located.	
15	Select the closest value;	
15 a	Number of employees	450
15 b	Total Assets	1-50
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	Between \$10 and \$100 million
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
16 b	If appropriate, provide any additional information / context to the answers in this section.	

	DUCTS & SERVICES	
17	Does the Entity offer the following products and services:	
17 a	Correspondent Banking	No
17 a1	If Y	
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?	No.
17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?	No
17 a4	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	No
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?	No
17 a6	Does the Entity allow downstream relationships with Foreign Banks?	No
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	No
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?	
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?	No .
17 b	Private Banking (domestic & international)	No
17 c	Trade Finance	
17 d	Payable Through Accounts	
17 e	Stored Value Instruments	No
17 f	Cross Border Bulk Cash Delivery	
17 g	Domestic Bulk Cash Delivery	
17 h	International Cash Letter	No
17 i	Remote Deposit Capture	
17]	Virtual /Digital Currencies	
17 k	Low Price Securities	
171	Hold Mail	No .
17 m	Cross Border Remittances	
17 n	Service to walk-in customers (non-account holders)	No .
17 o	Sponsoring Private ATMs	
17 p	Other high risk products and services identified by the Entity	
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	
8 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
8 b	If appropriate, provide any additional information / context to the answers in this section.	

	, CTF & SANCTIONS PROGRAMME	
19	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
19 a	Appointed Officer with sufficient experience/expertise	
19 b	Cash Reporting	
19 c	CDD	
19 d	EDD	
19 e	Beneficial Ownership	
19 f	Independent Testing	
19 g	Periodic Review	
19 h	Policies and Procedures	
19 i	Risk Assessment	
19 j	Sanctions	
19 k	PEP Screening	
191	Adverse Information Screening	
19 m	Suspicious Activity Reporting	
19 n	Training and Education	
19 o	Transaction Monitoring	
20	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	10-50
21	is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	
22	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	
23	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
23 a	If Y, provide further details	
24	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	
24 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
24 b	If appropriate, provide any additional information / context to the answers in this section.	
		Taipei branch does not deal with Cash

4. AN	TI BRIBERY & CORRUPTION	
25	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	
26	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	
27	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	
28	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	
29	Is the Entity's ABC programme applicable to:	Not Applicable
30	Does the Entity have a global ABC policy that:	
30 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	
30 b	Includes enhanced requirements regarding interaction with public officials?	
30 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)?	
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	
32	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	
33	Does the Entity perform an Enterprise Wide ABC risk assessment?	No
33 a	If Y select the frequency	
34	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	No
35	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
35 a	Potential liability created by intermediaries and other third-party providers as appropriate	
35 b	Corruption risks associated with the countries	Yes
35 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	
35 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	
35 e	Changes in business activities that may materially increase the Entity's corruption risk	
36	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	

37	Does the Entity provide mandatory ABC training to:	
37 a	Board and senior Committee Management	No.
37 b	1st Line of Defence	
37 c	2nd Line of Defence	
37 d	3rd Line of Defence	No
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	No "
37 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
39 ь	If appropriate, provide any additional information / context to the answers in this section,	

	CTF & SANCTIONS POLICIES & PROCE	DURES
40	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
40 a	Money laundering	
40 b	Terrorist financing	
40 c	Sanctions violations	
41	Are the Entity's policies and procedures updated at least annually?	
42	Are the Entity's policies and procedures gapped against/compared to:	
42 a	US Standards	
42 a1	If Y, does the Entity retain a record of the results?	
42 b	EU Standards	
42 b1	If Y, does the Entity retain a record of the results?	
43	Does the Entity have policies and procedures	
43 a	that: Prohibit the opening and keeping of anonymous and fictitious named accounts	
43 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	
43 c	Prohibit dealing with other entities that provide	
43 d	banking services to unlicensed banks Prohibit accounts/relationships with shell banks	
43 e	Prohibit dealing with another entity that provides	
43 f	services to shell banks Prohibit opening and keeping of accounts for	
40.0	Section 311 designated entities	
43 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	
43 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	
43 i	Define escalation processes for financial crime risk issues	
43 J	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	
43 k	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	HE .
43 1	Outline the processes regarding screening for sanctions, PEPs and negative media	
43 m	Outline the processes for the maintenance of internal "watchlists"	
44	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	
45	Does the Entity have a record retention procedures that comply with applicable laws?	
45 a	If Y, what is the retention period?	
16	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
16 b	If appropriate, provide any additional information / context to the answers in this section.	

47	Does the Entity's AML & CTF EWRA cover the	
	inherent risk components detailed below:	
47 a	Client	
47 b	Product	
47 c	Channel	
47 d	Geography	
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	
48 b	Customer Due Diligence	
48 c	PEP Identification	
48 d	Transaction Screening	
48 e	Name Screening against Adverse Media & Negative News	
48 f	Training and Education	
48 g	Governance	
48 h	Management Information	
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	
50 Ь	Product	
0 с	Channel	
0 d	Geography	

51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
51 a	Customer Due Diligence	
51 b	Transaction Screening	
51 c	Name Screening	
51 d	List Management	
51 e	Training and Education	
51 f	Governance	
51 g	Management Information	
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	
52 a	If N, provide the date when the last Sanctions EWRA was completed.	
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53 b	If appropriate, provide any additional information / context to the answers in this section.	

	C, CDD and EDD	
54	Does the Entity verify the identity of the customer?	
55	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	
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	
56 b	Customer identification	
56 ¢	Expected activity	
56 d	Nature of business/employment	
56 e	Product usage	
56 f	Purpose and nature of relationship	
56 g	Source of funds	
56 h	Source of wealth	
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	
57 a1	Are ultimate beneficial owners verified?	
57 b	Authorised signatories (where applicable)	
57 c	Key controllers	
57 d	Other relevant parties	
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	
59	Does the due diligence process result in customers receiving a risk classification?	

60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60 a	Product Usage	
60 b	Geography	
60 c	Business Type/Industry	
60 d	Legal Entity type	
60 e	Adverse Information	
60 f	Other (specify)	
61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	
62	If Y, is this at:	
62 a	Onboarding	
62 b	KYC renewal	
62 c	Trigger event	
63	What is the method used by the Entity to screen for adverse media / negative news?	
64	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
65	If Y, is this at:	
65 a	Onboarding	
65 b	KYC renewal	
65 c	Trigger event	
66	What is the method used by the Entity to screen PEPs?	
67	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?	
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	
68 b	Trigger event	
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	

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	
70 a	FCC programme? Non-account customers	
		Prohibited
70 b	Non-resident customers	Prohibited
70 c	Shell banks	Prohibited
70 d	MVTS/ MSB customers	
70 e	PEPs	
70 f	PEP Related	
70 g	PEP Close Associate	
70 h	Correspondent Banks	
70 h1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	
70 i	Arms, defense, military	Prohibited
70 j	Atomic power	
70 k	Extractive industries	
701	Precious metals and stones	
70 m	Unregulated charities	
70 n	Regulated charities	
70 o	Red light business / Adult entertainment	
70 p	Non-Government Organisations	
70 q	Virtual currencies	
70 r	Marijuana	
70 s	Embassies/Consulates	EDD on a risk based approach
70 t	Gambling	Prohibited
70 u	Payment Service Provider	EDD & restricted on a risk based approach
70 v	Other (specify)	200 S ASSAUGU WA DI TOK DESCO EPPICEGOT
71	If restricted, provide details of the restriction	
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	
73 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
73 b	If appropriate, provide any additional information / context to the answers in this section.	

74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?		
75	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual	
76	If manual or combination selected, specify what type of transactions are monitored manually		
77	Does the Entity have regulatory requirements to report suspicious transactions?		
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?		
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?		
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches		
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to		
79 b	If appropriate, provide any additional information / context to the answers in this section.		

9. PA	MENT TRANSPARENCY	
80	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	
81	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
81 a	FATF Recommendation 16	
81 b	Local Regulations	
81 b1	Specify the regulation	
81 c	If N, explain	
82	Does the Entity have processes in place to respond to Request For information (RFIs) from other entities in a timely manner?	
83	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	
84	Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?	
85	Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	
85 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
85 b	If appropriate, provide any additional information / context to the answers in this section.	

10. SA	ANCTIONS	TO THE RESERVE OF THE PARTY OF
86	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions?	
87	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)?	
88	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?	
89	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	
90	What is the method used by the Entity?	Combination of automated and manual
91	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	
92	What is the method used by the Entity?	Combination of automated and manual
93	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
93 a	Consolidated United Nations Security Council Sanctions List (UN)	
93 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	
93 c	Office of Financial Sanctions Implementation HMT (OFSI)	
93 d	European Union Consolidated List (EU)	
93 e	Lists maintained by other G7 member countries	
93 f	Other (specify)	
94	Question removed	
95	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:	
95 a	Customer Data	
95 b	Transactions	

96	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	

98	Does the Entity provide mandatory training.	
	which includes :	
98 a	Identification and reporting of transactions to government authorities	
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	
98 e	Conduct and Culture	
99	Is the above mandatory training provided to :	
99 a	Board and Senior Committee Management	
99 b	1st Line of Defence	
99 c	2nd Line of Defence	
99 d	3rd Line of Defence	
99 e	3rd parties to which specific FCC activities have been outsourced	
99 f	Non-employed workers (contractors/consultants)	
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	
101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
102 b	If appropriate, provide any additional information / context to the answers in this section.	

103	Are the Entity's KYC processes and documents subject to quality assurance testing?	
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
105 b	If appropriate, provide any additional information / context to the answers in this section.	

13. AL	IDIT	
106	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 and Sanctions policies and practices on a regular basis?	
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:	
107 a	Internal Audit Department	
107 b	External Third Party	
108	Does the internal audit function or other independent third party cover the following areas:	
108 a	AML, CTF & Sanctions policy and procedures	
108 b	KYC / CDD / EDD and underlying methodologles	
108 c	Transaction Monitoring	
108 d	Transaction Screening including for sanctions	
108 e	Name Screening & List Management	
108 f	Training & Education	
108 g	Technology	
108 h	Governance	
108 i	Reporting/Metrics & Management Information	
108 j	Suspicious Activity Filing	
108 k	Enterprise Wide Risk Assessment	
108	Other (specify)	
109	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	
110	Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches	
110 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110 b	If appropriate, provide any additional information / context to the answers in this section.	

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Declaration Statement	
Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2020 (CBDDQ V1,3) Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)	ad of
BBVA BANK, TAIWAN BRANCH	
(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 account	ints.
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 me legal and regulatory obligations.	ol its
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting the standards.	ese
The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Princ The information provided in this Wolfsberg CBDDO will be kept current and will be updated no less frequently than on an annual basis.	iples
The Financial Institution commits to file accurate supplemental information on a timely basis.	
JAMES KAO	
(Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration	on, th
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. DAND PAN	1
i. (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in the	
Wolfsberg CBDDQ are complete and correct to my ponest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.	nis
Chronol ao (Signature & Date)	
Belle (Signature & Date) 222, 7, 86	
(Signature & Date)	

the Wolfsberg Group

Financial Institution Name:	Banco Bilbao Vizcaya Argentaria S.A., Niederlassung Deutschland	
	Germany	
Location (Country) :	2 Control of the cont	

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer	
1. ENT	ITY & OWNERSHIP		
1	Full Legal Name	Banco Bilbao Vizcaya Argentaria S.A.	
2	Append a list of foreign branches which are covered by this questionnaire	Banco Bilbao Vizcaya Argentaria S.A., Niederlassung Deutschland	
3	Full Legal (Registered) Address	Neue Mainzer Str. 28, 60311 Frankfurt am Main	
4	Full Primary Business Address (if different from above)		
5	Date of Entity incorporation/ establishment	German Branch established in 2008	
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 ullimate beneficial owners with a holding of 10% or more		
7	% of the Entity's total shares composed of bearer shares	0%	
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	No	P
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL		1
9	Name of primary financial regulator / supervisory authority	Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin), Germany	1-00

10	Provide Legal Entity Identifier (LEI) if available	K8MS7FD7N5Z2WQ51AZ71	
11	Provide the full legal name of the ultimate parent (if different from the Enlity completing the DDQ)		
12	Jurisdiction of licensing authority and regulator of ultimate parent		
13	Select the business areas applicable to the Entity		
13 a	Retail Banking	No	+
13 b	Private Banking / Wealth Management	No	•
13 c	Commercial Banking		
13 d	Transactional Banking		
13 e	Investment Banking		
13 f	Financial Markets Trading	No T	¥
13 g	Securities Services / Custody	No	¥
13 h	Broker / Dealer	No	Ţ
13	Multilateral Development Bank		
13 j	Other		
14	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided.)		
14 a	If Y, provide the top five countries where the non- resident customers are located,		
15	Select the closest value:		
15 a	Number of employees	1-50	-
15 b	Total Assets		
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches		
6 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
6 b	If appropriate, provide any additional information / context to the answers in this section.		

2. PRC	DUCTS & SERVICES		
17	Does the Entity offer the following products and services:		
17 a	Correspondent Banking	No	(*
17 a1	If Y		
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?		
17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?		
17 a4	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?		
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?		
17 a6	Does the Entity allow downstream relationships with Foreign Banks?		
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?		
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?		
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?		
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?		
17 b	Private Banking (domestic & international)	No	-
17 c	Trade Finance		-
17 d	Payable Through Accounts		
17 e	Stored Value Instruments	No	-
17 f	Cross Border Bulk Cash Delivery		
17 g	Domestic Bulk Cash Delivery		
17 h	International Cash Letter		
17 (Remote Deposit Capture		
17 j	Virtual /Digital Currencies		
17 k	Low Price Securities		
17 1	Hold Mail	No	-
17 m	Cross Border Remittances	No	
17 n	Service to walk-in customers (non-account	No	-
17 o	holders) Sponsoring Private ATMs	No	-
17 р	Other high risk products and services identified by the Entity	No.	-
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches		
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
8 b	If appropriate, provide any additional information / context to the answers in this section.		

3. AML	, CTF & SANCTIONS PROGRAMME	
19	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
19 a	Appointed Officer with sufficient experience/expertise	
19 b	Cash Reporting	
19 с	CDD	
19 d	EDD	
19 e	Beneficial Ownership	
19 f	Independent Testing	
19 g	Periodic Review	
19 h	Policies and Procedures	
19 i	Risk Assessment	
19 j	Sanctions	
19 k	PEP Screening	
19 (Adverse Information Screening	
19 m	Suspicious Activity Reporting	
19 n	Training and Education	
19 o	Transaction Monitoring	
20	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	Less than 10
21	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	
22	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	
23	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	
23 a	If Y, provide further details	
24	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	
24 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
24 b	If appropriate, provide any additional information / context to the answers in this section.	All the main policies come from the headquarter BBVA S.A., were a stricter approach is necessary we implemented local procedures.

10000	TI BRIBERY & CORRUPTION	
25	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	
26	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	
27	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	
28	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	
29	Is the Entity's ABC programme applicable to:	
30	Does the Entity have a global ABC policy that:	
30 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	
30 Ь	Includes enhanced requirements regarding interaction with public officials?	
30 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	
32	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	
33	Does the Entity perform an Enterprise Wide ABC risk assessment?	
33 a	If Y select the frequency	
34	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	
35	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
35 a	Potential liability created by intermediaries and other third-party providers as appropriate	
35 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	
35 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	
35 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	
5 e	Changes in business activities that may materially increase the Entity's corruption risk	
36	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	

37	Does the Entity provide mandatory ABC training to:	
37 a	Board and senior Committee Management	
37 b	1st Line of Defence	
37 с	2nd Line of Defence	
37 d	3rd Line of Defence	
37 е	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	
37 f	Non-employed workers as appropriate (contractors/consultants)	
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
39 b	If appropriate, provide any additional information / context to the answers in this section.	

TOTAL DAY OF	., CTF & SANCTIONS POLICIES & PROCEI	DUKES
40	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
40 a	Money laundering	
40 b	Terrorist financing	
40 c	Sanctions violations	
41	Are the Entity's policies and procedures updated	
42	at least annually? Are the Entity's policies and procedures gapped	
42 a	against/compared to: US Standards	
	177777777	
42 a1	If Y, does the Entity retain a record of the results?	
42 b	EU Standards	
42 b1	If Y, does the Entity retain a record of the results?	
43	Does the Entity have policies and procedures that:	
43 a	Prohibit the opening and keeping of anonymous	
43 b	and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	
43 c	Prohibit dealing with other entities that provide	
43 d	banking services to unlicensed banks Prohibit accounts/relationships with shell banks	
43 e	Prohibit dealing with another entity that provides	
43 f	services to shell banks Prohibit opening and keeping of accounts for	
	Section 311 designated entities	
43 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	
43 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	
43 i	Define escalation processes for financial crime risk issues	
43 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	
43 k	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	
13 (Outline the processes regarding screening for sanctions, PEPs and negative media	
13 m	Outline the processes for the maintenance of internal "watchlists"	
44	Has the Entity defined a risk tolerance statement or similar document which defines a risk	
45	boundary around their business? Does the Entity have a record retention	
45 a	procedures that comply with applicable laws? If Y, what is the retention period?	
1-1-1-		
16	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
16 b	If appropriate, provide any additional information / context to the answers in this section.	

47	L, CTF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the	
47	inherent risk components detailed below:	
47 a	Client	
47 b	Product	
47 c	Channel	
47 d	Geography	
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	
48 b	Customer Due Diligence	
48 c	PEP Identification	
48 d	Transaction Screening	
48 e	Name Screening against Adverse Media & Negative News	
48 f	Training and Education	
48 g	Governance	
48 h	Management Information	
19	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	
19 a	If N, provide the date when the last AML & CTF EWRA was completed.	
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	
50 Ь	Product	
50 c	Channel	
60 d	Geography	

51	Does the Entity's Sanctions EWRA cover the	
	controls effectiveness components detailed	
	below:	
51 a	Customer Due Diligence	
51 b	Transaction Screening	
51 c	Name Screening	
51 d	List Management	
51 e	Training and Education	
51 f	Governance	
51 g	Management Information	
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	
52 a	If N, provide the date when the last Sanctions EWRA was completed.	
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53 b	If appropriate, provide any additional information / context to the answers in this section.	

7. KY	C, CDD and EDD	
54	Does the Entity verify the identity of the customer?	
55	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	
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	
56 b	Customer identification	
56 c	Expected activity	
56 d	Nature of business/employment	
56 e	Product usage	
56 f	Purpose and nature of relationship	
56 g	Source of funds	
56 h	Source of wealth	
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	
57 a1	Are ultimate beneficial owners verified?	
57 b	Authorised signatories (where applicable)	
57 c	Key controllers	
57 d	Other relevant parties	
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	
59	Does the due diligence process result in customers receiving a risk classification?	

60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60 a	Product Usage	
60 b	Geography	
60 c	Business Type/Industry	
60 d	Legal Entity type	
60 e	Adverse Information	
60 f	Other (specify)	
61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	
62	If Y, is this at:	
62 a	Onboarding	
62 b	KYC renewal	
62 c	Trigger event	
63	What is the method used by the Entity to screen for adverse media / negative news?	
64	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
65	If Y, is this at:	
65 a	Onboarding	
65 b	KYC renewal	
65 с	Trigger event	
66	What is the method used by the Entity to screen PEPs?	
67	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?	
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	
68 b	Trigger event	
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	

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?		
70 a	Non-account customers		
70 b	Non-resident customers		
70 c	Shell banks		
70 d	MVTS/ MSB customers		
70 e	PEPs		
70 f	PEP Related		
70 g	PEP Close Associate		
70 h	Correspondent Banks		
70 h1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?		
70 i	Arms, defense, military		
70 j	Atomic power		
70 k	Extractive industries	EDD on a risk based approach	
70 I	Precious metals and stones		
70 m	Unregulated charities		
70 n	Regulated charities		
70 o	Red light business / Adult entertainment		
70 p	Non-Government Organisations		
70 q	Virtual currencies		
70 r	Marijuana		
70 s	Embassies/Consulates		
70 t	Gambling	EDD on a risk based approach	Ŧ
70 u	Payment Service Provider		
70 v	Other (specify)		1
71	If restricted, provide details of the restriction		
72	Does the Entity perform an additional control or quality review on clients subject to EDD?		
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches		
73 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to		
73 b	If appropriate, provide any additional information / context to the answers in this section.		

74	Does the Entity have risk based policies,	
	procedures and monitoring processes for the identification and reporting of suspicious activity?	
75	What is the method used by the Entity to monitor transactions for suspicious activities?	
76	If manual or combination selected, specify what type of transactions are monitored manually	
77	Does the Entity have regulatory requirements to report suspicious transactions?	
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
79 b	If appropriate, provide any additional information / context to the answers in this section.	

80	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	
81	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
81 a	FATF Recommendation 16	
81 b	Local Regulations	
81 b1	Specify the regulation	
81 c	If N, explain	
82	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	
83	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	
84	Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?	
85	Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	
85 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
85 b	If appropriate, provide any additional information / context to the answers in this section.	

IU. SM	INCTIONS	
86	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions?	
87	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)?	
88	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?	
89	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	
90	What is the method used by the Entity?	
91	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	
92	What is the method used by the Entity?	
93	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
93 a	Consolidated United Nations Security Council Sanctions List (UN)	
93 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	
93 с	Office of Financial Sanctions Implementation HMT (OFSI)	
93 d	European Union Consolidated List (EU)	
93 e	Lists maintained by other G7 member countries	
93 f	Other (specify)	
94	Question removed	
95	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:	
95 a	Customer Data	
95 b	Transactions	

96	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	
97 a	If N. clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	

98	Does the Entity provide mandatory training,	
17	which includes :	
98 a	Identification and reporting of transactions to government authorities	
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	
98 e	Conduct and Culture	
99	Is the above mandatory training provided to :	
99 a	Board and Senior Committee Management	
99 b	1st Line of Defence	
99 с	2nd Line of Defence	
99 d	3rd Line of Defence	
99 e	3rd parties to which specific FCC activities have been outsourced	
99 f	Non-employed workers (contractors/consultants)	
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	
101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
102 Ь	If appropriate, provide any additional information / context to the answers in this section.	In addition to the BBVA Group Trainings / webbased Trainings - BBVA Germany locally provide a regular onsite Training on AML & CTF plus Compliance. The local Training procedure is described in the local Training Policy.

103	Are the Entity's KYC processes and documents subject to quality assurance testing?	
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
105 b	If appropriate, provide any additional information / context to the answers in this section,	

13. AU		
106	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 and Sanctions policies and practices on a regular basis?	
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:	
107 a	Internal Audit Department	
107 b	External Third Party	
108	Does the internal audit function or other independent third party cover the following areas:	
108 a	AML, CTF & Sanctions policy and procedures	
108 b	KYC / CDD / EDD and underlying methodologies	
108 с	Transaction Monitoring	
108 d	Transaction Screening including for sanctions	
108 e	Name Screening & List Management	
108 f	Training & Education	
108 g	Technology	
108 h	Governance	
108 i	Reporting/Metrics & Management Information	
108 j	Suspicious Activity Filing	
108 k	Enterprise Wide Risk Assessment	
108 I	Other (specify)	
109	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	
110	Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches	
110 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110 Ь	If appropriate, provide any additional information / context to the answers in this section.	

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Declaration Statement	
Wolfsberg Group Correspondent Banking Due Diligence Qu Declaration Statement (To be signed by Global Head of Cor Anti-Money Laundering, Chief Compliance Officer, Global H	rrespondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of
BBVA S.A., Niederlassung Deutschland	
every effort to remain in full compliance with all applicable fir	(Financial Institution name) is fully committed to the fight against financial crime and makes nancial 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 legal and regulatory obligations.	of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its
The Financial institution recognises the importance of transportance of transportances.	parency regarding parties to transactions in international payments and has adopted/is committed to adopting these
	working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles, pt current and will be updated no less frequently than on an annual basis.
The Financial Institution commits to file accurate supplement	tal information on a timely basis.
N/A	(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 complet Institution.	fe and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial
Sevgi Dursun-Haller, AML Officer Germany	
 Wolfsberg CBDDQ are complete and correct to my honest b. 	_ (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this ellef, and that I am authorised to execute this declaration on behalf of the Financial Institution.
N/A	
	(Signafure & Date)
2 1/ 3	
Sevgi Dursun-Haller	(Signature & Date)
BBVAT	16-5
Banco Bilbao Vizco Argentariars	

Niederlassung Deutschland Neue Mainzer Str. 28 60311 Frankfurt

the Wolfsberg Group

Financial Institution Name:	
Location (Country) :	

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1. ENT	TY & 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	
0 a i	symbol	
6 b	Member Owned/ Mutual	
6 c	Government or State Owned by 25% or more	
0.0	Government of State Owned by 25% of filore	
6 d	Privately Owned	
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
	beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of	
	bearer shares	
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8 a	If Y, provide the name of the relevant branch/es	
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9	Name of primary financial regulator / supervisory	
	authority	
Ļ	Ļ	

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13 h	Broker / Dealer	
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14 a	If Y, provide the top five countries where the non-resident customers are located.	
15	Select the closest value:	
15 a	Number of employees	
15 b	Total Assets	
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
16 b	If appropriate, provide any additional information / context to the answers in this section.	

2. PROI	DUCTS & SERVICES	
17	Does the Entity offer the following products and	
	services:	
17 a	Correspondent Banking	
17 a1	If Y	
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?	
17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?	
17 a4	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?	
17 a6	Does the Entity allow downstream relationships with Foreign Banks?	
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?	
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?	
17 b	Private Banking (domestic & international)	
17 c	Trade Finance	
17 d	Payable Through Accounts	
17 e	Stored Value Instruments	
17 f	Cross Border Bulk Cash Delivery	
17 g	Domestic Bulk Cash Delivery	
17 h	International Cash Letter	
17 i	Remote Deposit Capture	
17 j	Virtual /Digital Currencies	
17 k	Low Price Securities	
17 I	Hold Mail	
17 m	Cross Border Remittances	
17 n	Service to walk-in customers (non-account holders)	
17 o	Sponsoring Private ATMs	
17 p	Other high risk products and services identified by the Entity	
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18 b	If appropriate, provide any additional information / context to the answers in this section.	

3. AML,	CTF & SANCTIONS PROGRAMME	
19	Does the Entity have a programme that sets	
	minimum AML, CTF and Sanctions standards regarding the following components:	
19 a	Appointed Officer with sufficient experience/expertise	
19 b	Cash Reporting	
19 с	CDD	
19 d	EDD	
19 e	Beneficial Ownership	
19 f	Independent Testing	
19 g	Periodic Review	
19 h	Policies and Procedures	
19 i	Risk Assessment	
19 ј	Sanctions	
19 k	PEP Screening	
19 I	Adverse Information Screening	
19 m	Suspicious Activity Reporting	
19 n	Training and Education	
19 o	Transaction Monitoring	
20	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	
21	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	
22	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	
23	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	
23 a	If Y, provide further details	
24	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	
24 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
24 b	If appropriate, provide any additional information / context to the answers in this section.	

4. ANTI	BRIBERY & CORRUPTION	
25	Has the Entity documented policies and	
23	procedures consistent with applicable ABC	
	regulations and requirements to [reasonably]	
	prevent, detect and report bribery and	
	corruption?	
26	Does the Entity have an enterprise wide	
20	programme that sets minimum ABC standards?	
27	Has the Entity appointed a designated officer or	
21	officers with sufficient experience/expertise	
	responsible for coordinating the ABC	
	programme?	
28	Does the Entity have adequate staff with	
	appropriate levels of experience/expertise to	
	implement the ABC programme?	
29	Is the Entity's ABC programme applicable to:	
30	Does the Entity have a global ABC policy that:	
30 a	Prohibits the giving and receiving of bribes?	
1	This includes promising, offering, giving,	
1	solicitation or receiving of anything of value,	
	directly or indirectly, if improperly intended to	
	influence action or obtain an advantage	
30 b	Includes enhanced requirements regarding	
	interaction with public officials?	
30 c	Includes a prohibition against the falsification of	
30 0	books and records (this may be within the ABC	
	policy or any other policy applicable to the Legal	
	Entity)?	
31		
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	
32	Does the Entity's Board or Senior Management	
	Committee receive regular Management	
	Information on ABC matters?	
33	Does the Entity perform an Enterprise Wide	
	ABC risk assessment?	
33 a	If Y select the frequency	
34	Does the Entity have an ABC residual risk rating	
	that is the net result of the controls effectiveness	
	and the inherent risk assessment?	
35	Does the Entity's ABC EWRA cover the inherent	
	risk components detailed below:	
1		
05 -	Detected Paker and the Control of th	
35 a	Potential liability created by intermediaries and	
L	other third-party providers as appropriate	
35 b	Corruption risks associated with the countries	
	and industries in which the Entity does business,	
	directly or through intermediaries	
35 c	Transactions, products or services, including	
1	those that involve state-owned or state-	
	controlled entities or public officials	
35 d	Corruption risks associated with gifts and	
-	hospitality, hiring/internships, charitable	
	donations and political contributions	
35 e	Changes in business activities that may	
33 C	materially increase the Entity's corruption risk	
20		
36	Does the Entity's internal audit function or other	
	independent third party cover ABC Policies and	
	Procedures?	

37	Does the Entity provide mandatory ABC training to:	
37 a	Board and senior Committee Management	
37 b	1st Line of Defence	
37 с	2nd Line of Defence	
37 d	3rd Line of Defence	
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	
37 f	Non-employed workers as appropriate (contractors/consultants)	
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
39 b	If appropriate, provide any additional information / context to the answers in this section.	

	CTF & SANCTIONS POLICIES & PROCEI	JUKES
40	Has the Entity documented policies and	
	procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to	
	reasonably prevent, detect and report:	
40 a	Money laundering	
40 b	Terrorist financing	
40 с	Sanctions violations	
41	Are the Entity's policies and procedures updated	
40	at least annually?	
42	Are the Entity's policies and procedures gapped against/compared to:	
42 a	US Standards	
42 a1	If Y, does the Entity retain a record of the results?	
42 b	EU Standards	
42 b1	If Y, does the Entity retain a record of the results?	
43	Does the Entity have policies and procedures that:	
43 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	
43 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	
43 c	Prohibit dealing with other entities that provide	
43 d	banking services to unlicensed banks Prohibit accounts/relationships with shell banks	
43 e	Prohibit dealing with another entity that provides	
43 f	services to shell banks Prohibit opening and keeping of accounts for	
	Section 311 designated entities	
43 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio,	
43 h	bureaux de change or money transfer agents	
43 N	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	
43 i	Define escalation processes for financial crime risk issues	
43 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	
43 k	Specify how potentially suspicious activity	
	identified by employees is to be escalated and investigated	
43 I	Outline the processes regarding screening for sanctions, PEPs and negative media	
43 m	Outline the processes for the maintenance of internal "watchlists"	
44	Has the Entity defined a risk tolerance statement or similar document which defines a risk	
45	boundary around their business? Does the Entity have a record retention	
4E o	procedures that comply with applicable laws?	
45 a	If Y, what is the retention period?	
46	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	
46 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
46 b	If appropriate, provide any additional information	

6. AML	, CTF & SANCTIONS RISK ASSESSMENT	
47	Does the Entity's AML & CTF EWRA cover the	
**	inherent risk components detailed below:	
47 a	Client	
47 b	Product	
47 c	Channel	
47 d	Geography	
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	
48 b	Customer Due Diligence	
48 c	PEP Identification	
48 d	Transaction Screening	
48 e	Name Screening against Adverse Media & Negative News	
48 f	Training and Education	
48 g	Governance	
48 h	Management Information	
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	
50 b	Product	
50 с	Channel	
50 d	Geography	

51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
51 a	Customer Due Diligence	
51 b	Transaction Screening	
51 c	Name Screening	
51 d	List Management	
51 e	Training and Education	
51 f	Governance	
51 g	Management Information	
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	
52 a	If N, provide the date when the last Sanctions EWRA was completed.	
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53 b	If appropriate, provide any additional information / context to the answers in this section.	

. KYC	C, CDD and EDD	
54	Does the Entity verify the identity of the customer?	
55	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	
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	
56 b	Customer identification	
56 с	Expected activity	
56 d	Nature of business/employment	
56 e	Product usage	
56 f	Purpose and nature of relationship	
56 g	Source of funds	
56 h	Source of wealth	
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	
57 a1	Are ultimate beneficial owners verified?	
57 b	Authorised signatories (where applicable)	
57 с	Key controllers	
57 d	Other relevant parties	
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	
59	Does the due diligence process result in customers receiving a risk classification?	

60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60 a	Product Usage	
60 b	Geography	
60 c	Business Type/Industry	
60 d	Legal Entity type	
60 e	Adverse Information	
60 f	Other (specify)	
61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	
62	If Y, is this at:	
62 a	Onboarding	
62 b	KYC renewal	
62 c	Trigger event	
63	What is the method used by the Entity to screen for adverse media / negative news?	
64	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
65	If Y, is this at:	
65 a	Onboarding	
65 b	KYC renewal	
65 c	Trigger event	
66	What is the method used by the Entity to screen PEPs?	
67	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?	
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	
68 b	Trigger event	
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	

	Provide Parkets (C.) (C.)	
70	From the list below, which categories of	
1	customers or industries are subject to EDD	
	and/or are restricted, or prohibited by the Entity's	
	FCC programme?	
70 a	Non-account customers	
70 b	Non-resident customers	
70 B	Non-resident customers	
70 c	Shell banks	
70 d	MVTS/ MSB customers	
70 e	PEPs	
70 E	FEFS	
70 f	PEP Related	
70 g	PEP Close Associate	
•		
70 h	Correspondent Banks	
70 11	Correspondent Banks	
70 h1	If EDD or EDD & restricted, does the EDD	
	assessment contain the elements as set out in	
	the Wolfsberg Correspondent Banking	
L	Principles 2014?	
70 i	Arms, defense, military	
	· · · · · · · · · · · · · · · · · · ·	
70 j	Atomic power	
/U J	Atomic power	
70 k	Extractive industries	
70 I	Precious metals and stones	
-		
70	I lawa mulata di abaniti a	
70 m	Unregulated charities	
70 n	Regulated charities	
70 o	Red light business / Adult entertainment	
	rica ngin baomboo, riaan omenammen	
70	New Courses and Consciontions	
70 p	Non-Government Organisations	
70 q	Virtual currencies	
70 r	Marijuana	
	, , , , , , , , , , , , , , , , , , , ,	
70 s	Embassies/Consulates	
10 5	Embassies/Consulates	
70 t	Gambling	
70 u	Payment Service Provider	
	.,	
70 11	Other (specify)	
70 v	Other (specify)	
74	If rootricted provide details of the rootriction	
71	If restricted, provide details of the restriction	
72	Does the Entity perform an additional control or	
· -	quality review on clients subject to EDD?	
70		
73	Confirm that all responses provided in the above	
	Section KYC, CDD and EDD are representative	
1	of all the LE's branches	
73 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to	
	2 2.1.2 2.1.2 2.1.2 2.0 4.1.0 app.130 to	
1		
73 b	If appropriate, provide any additional information	
1	/ context to the answers in this section.	

8. MO	NITORING & REPORTING	
74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	
75	What is the method used by the Entity to monitor transactions for suspicious activities?	
76	If manual or combination selected, specify what type of transactions are monitored manually	
77	Does the Entity have regulatory requirements to report suspicious transactions?	
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
79 b	If appropriate, provide any additional information / context to the answers in this section.	

MENT TRANSPARENCY	
Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	
Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
FATF Recommendation 16	
Local Regulations	
Specify the regulation	
If N, explain	
Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	
Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	
Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?	
Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY 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.	
	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: FATF Recommendation 16 Local Regulations Specify the regulation If N, explain Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages? Does the Entity have controls to support the inclusion of required beneficiary information international payment messages? Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY 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.

10. SA	NCTIONS	
86	Does the Entity have a Sanctions Policy	
00	approved by management regarding	
	, , , , ,	
	compliance with sanctions law applicable to the	
	Entity, including with respect its business	
	conducted with, or through accounts held at	
	foreign financial institutions?	
87	Does the Entity have policies, procedures, or	
01	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)?	
88	Does the Entity have policies, procedures or	
00	' ''	
	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?	
89	Does the Entity screen its customers, including	
33		
	beneficial ownership information collected by the	
	Entity, during onboarding and regularly	
	thereafter against Sanctions Lists?	
90	What is the method used by the Entity?	
91	Does the Entity screen all sanctions relevant	
31		
	data, including at a minimum, entity and location	
	information, contained in cross border	
	transactions against Sanctions Lists?	
92	What is the method used by the Entity?	
	, , , , , , , , , , , , , , , , , , , ,	
93	Select the Sanctions Lists used by the Entity in	
	its sanctions screening processes:	
93 a	Consolidated United Nations Security Council	
00 u	Sanctions List (UN)	
93 b	United States Department of the Treasury's	
93 D		
	Office of Foreign Assets Control (OFAC)	
93 c	Office of Financial Sanctions Implementation	
	HMT (OFSI)	
93 d	European Union Consolidated List (EU)	
93 e	Lists maintained by other G7 member countries	
93 f	Other (specify)	
	'' ''	
94	Question removed	
95	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:	
05.0	, , , , , , , , , , , , , , , , , , ,	
95 a	Customer Data	
95 b	Transactions	

	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	

	AINING & EDUCATION	
98	Does the Entity provide mandatory training, which includes :	
98 a	Identification and reporting of transactions to government authorities	
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	
98 e	Conduct and Culture	
99	Is the above mandatory training provided to :	
99 a	Board and Senior Committee Management	
99 b	1st Line of Defence	
99 с	2nd Line of Defence	
99 d	3rd Line of Defence	
99 e	3rd parties to which specific FCC activities have been outsourced	
99 f	Non-employed workers (contractors/consultants)	
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	
101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
102 b	If appropriate, provide any additional information / context to the answers in this section.	

12. QU	ALITY ASSURANCE /COMPLIANCE TESTI	NG
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
105 b	If appropriate, provide any additional information / context to the answers in this section.	

13. AUE	DIT	
106	In addition to inspections by the government	
106		
	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 and Sanctions policies and	
	practices on a regular basis?	
107	How often is the Entity audited on its AML, CTF	
	& Sanctions programme by the following:	
107 a	Internal Audit Department	
107 b	External Third Party	
108	Does the internal audit function or other	
	independent third party cover the following	
	areas:	
108 a	AML, CTF & Sanctions policy and procedures	
100 a	Aivie, 611 & Sanctions policy and procedures	
108 b	KYC / CDD / EDD and underlying	
	methodologies	
108 c	Transaction Monitoring	
108 d	Transaction Screening including for sanctions	
	g and g and g	
108 e	Name Screening & List Management	
108 f	Training & Education	
.00 .	Training & Education	
108 g	Technology	
108 h	Governance	
108 i	Reporting/Metrics & Management Information	
400 :	Consistent Astrik Filips	
108 j	Suspicious Activity Filing	
108 k	Enterprise Wide Risk Assessment	
	Zine-price vide view vicecountri	
108 I	Other (specify)	
1001	Other (Specify)	
109	Are adverse findings from internal & external	
	audit tracked to completion and assessed for	
	adequacy and completeness?	
110	Confirm that all responses provided in the above	
-	section, AUDIT are representative of all the LE's	
	branches	
110 a	If N, clarify which questions the difference/s	
1 1 U a	relate to and the branch/es that this applies to.	
	Totale to and the braneness that this applies to.	
110 b	If appropriate, provide any additional information	
	/ context to the answers in this section.	

Declaration Statement	
Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2020 (CBDDQ V1.3) Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Glob Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)	al Head of
(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 a	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 legal and regulatory obligations.	I to meet its
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopt standards.	ling these
The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Financial Institution provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than on an annual basis.	e Principles.
The Financial Institution commits to file accurate supplemental information on a timely basis.	
I,	
I, (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided 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.	in this
(Signature & Date)	
(Signature & Date)	

the Wolfsberg Group

Financial Institution Name:	
Location (Country) :	

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer
1. ENT	TY & 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	
0 a i	symbol	
6 b	Member Owned/ Mutual	
6 c	Government or State Owned by 25% or more	
0.0	Government of State Owned by 25% of filore	
6 d	Privately Owned	
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
	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	Name of primary financial regulator / supervisory	
	authority	
Ļ	Ļ	

10	Provide Legal Entity Identifier (LEI) if available	
11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	
12	Jurisdiction of licensing authority and regulator of ultimate parent	
13	Select the business areas applicable to the Entity	
13 a	Retail Banking	
13 b	Private Banking / Wealth Management	
13 c	Commercial Banking	
13 d	Transactional Banking	
13 e	Investment Banking	
13 f	Financial Markets Trading	
13 g	Securities Services / Custody	
13 h	Broker / Dealer	
13 i	Multilateral Development Bank	
13 ј	Other	
14	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided.)	
14 a	If Y, provide the top five countries where the non-resident customers are located.	
15	Select the closest value:	
15 a	Number of employees	
15 b	Total Assets	
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
16 b	If appropriate, provide any additional information / context to the answers in this section.	

2. PROI	DUCTS & SERVICES	
17	Does the Entity offer the following products and	
	services:	
17 a	Correspondent Banking	
17 a1	If Y	
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?	
17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?	
17 a4	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?	
17 a6	Does the Entity allow downstream relationships with Foreign Banks?	
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?	
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?	
17 b	Private Banking (domestic & international)	
17 c	Trade Finance	
17 d	Payable Through Accounts	
17 e	Stored Value Instruments	
17 f	Cross Border Bulk Cash Delivery	
17 g	Domestic Bulk Cash Delivery	
17 h	International Cash Letter	
17 i	Remote Deposit Capture	
17 j	Virtual /Digital Currencies	
17 k	Low Price Securities	
17 I	Hold Mail	
17 m	Cross Border Remittances	
17 n	Service to walk-in customers (non-account holders)	
17 o	Sponsoring Private ATMs	
17 p	Other high risk products and services identified by the Entity	
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18 b	If appropriate, provide any additional information / context to the answers in this section.	

3. AML,	CTF & SANCTIONS PROGRAMME	
19	Does the Entity have a programme that sets	
	minimum AML, CTF and Sanctions standards regarding the following components:	
19 a	Appointed Officer with sufficient experience/expertise	
19 b	Cash Reporting	
19 с	CDD	
19 d	EDD	
19 e	Beneficial Ownership	
19 f	Independent Testing	
19 g	Periodic Review	
19 h	Policies and Procedures	
19 i	Risk Assessment	
19 ј	Sanctions	
19 k	PEP Screening	
19 I	Adverse Information Screening	
19 m	Suspicious Activity Reporting	
19 n	Training and Education	
19 o	Transaction Monitoring	
20	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	
21	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	
22	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	
23	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	
23 a	If Y, provide further details	
24	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	
24 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
24 b	If appropriate, provide any additional information / context to the answers in this section.	

4. ANTI	BRIBERY & CORRUPTION	
25	Has the Entity documented policies and	
23	procedures consistent with applicable ABC	
	regulations and requirements to [reasonably]	
	prevent, detect and report bribery and	
	corruption?	
26	Does the Entity have an enterprise wide	
20	programme that sets minimum ABC standards?	
27	Has the Entity appointed a designated officer or	
21	officers with sufficient experience/expertise	
	responsible for coordinating the ABC	
	programme?	
28	Does the Entity have adequate staff with	
	appropriate levels of experience/expertise to	
	implement the ABC programme?	
29	Is the Entity's ABC programme applicable to:	
30	Does the Entity have a global ABC policy that:	
30 a	Prohibits the giving and receiving of bribes?	
1	This includes promising, offering, giving,	
1	solicitation or receiving of anything of value,	
	directly or indirectly, if improperly intended to	
	influence action or obtain an advantage	
30 b	Includes enhanced requirements regarding	
	interaction with public officials?	
30 c	Includes a prohibition against the falsification of	
30 0	books and records (this may be within the ABC	
	policy or any other policy applicable to the Legal	
	Entity)?	
31		
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	
32	Does the Entity's Board or Senior Management	
	Committee receive regular Management	
	Information on ABC matters?	
33	Does the Entity perform an Enterprise Wide	
	ABC risk assessment?	
33 a	If Y select the frequency	
34	Does the Entity have an ABC residual risk rating	
	that is the net result of the controls effectiveness	
	and the inherent risk assessment?	
35	Does the Entity's ABC EWRA cover the inherent	
	risk components detailed below:	
1		
05 -	Detected Paker and the Control of th	
35 a	Potential liability created by intermediaries and	
L	other third-party providers as appropriate	
35 b	Corruption risks associated with the countries	
1	and industries in which the Entity does business,	
	directly or through intermediaries	
35 c	Transactions, products or services, including	
1	those that involve state-owned or state-	
	controlled entities or public officials	
35 d	Corruption risks associated with gifts and	
-	hospitality, hiring/internships, charitable	
	donations and political contributions	
35 e	Changes in business activities that may	
33 C	materially increase the Entity's corruption risk	
20		
36	Does the Entity's internal audit function or other	
	independent third party cover ABC Policies and	
	Procedures?	

37	Does the Entity provide mandatory ABC training to:	
37 a	Board and senior Committee Management	
37 b	1st Line of Defence	
37 с	2nd Line of Defence	
37 d	3rd Line of Defence	
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	
37 f	Non-employed workers as appropriate (contractors/consultants)	
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
39 b	If appropriate, provide any additional information / context to the answers in this section.	

	CTF & SANCTIONS POLICIES & PROCEI	JUKES
40	Has the Entity documented policies and	
	procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to	
	reasonably prevent, detect and report:	
40 a	Money laundering	
40 b	Terrorist financing	
40 с	Sanctions violations	
41	Are the Entity's policies and procedures updated	
40	at least annually?	
42	Are the Entity's policies and procedures gapped against/compared to:	
42 a	US Standards	
42 a1	If Y, does the Entity retain a record of the results?	
42 b	EU Standards	
42 b1	If Y, does the Entity retain a record of the results?	
43	Does the Entity have policies and procedures that:	
43 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	
43 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	
43 c	Prohibit dealing with other entities that provide	
43 d	banking services to unlicensed banks Prohibit accounts/relationships with shell banks	
43 e	Prohibit dealing with another entity that provides	
43 f	services to shell banks Prohibit opening and keeping of accounts for	
	Section 311 designated entities	
43 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio,	
43 h	bureaux de change or money transfer agents	
43 N	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	
43 i	Define escalation processes for financial crime risk issues	
43 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	
43 k	Specify how potentially suspicious activity	
	identified by employees is to be escalated and investigated	
43 I	Outline the processes regarding screening for sanctions, PEPs and negative media	
43 m	Outline the processes for the maintenance of internal "watchlists"	
44	Has the Entity defined a risk tolerance statement or similar document which defines a risk	
45	boundary around their business? Does the Entity have a record retention	
4E o	procedures that comply with applicable laws?	
45 a	If Y, what is the retention period?	
46	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	
46 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
46 b	If appropriate, provide any additional information	

6. AML	, CTF & SANCTIONS RISK ASSESSMENT	
47	Does the Entity's AML & CTF EWRA cover the	
**	inherent risk components detailed below:	
47 a	Client	
47 b	Product	
47 c	Channel	
47 d	Geography	
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	
48 b	Customer Due Diligence	
48 c	PEP Identification	
48 d	Transaction Screening	
48 e	Name Screening against Adverse Media & Negative News	
48 f	Training and Education	
48 g	Governance	
48 h	Management Information	
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	
50 b	Product	
50 с	Channel	
50 d	Geography	

51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
51 a	Customer Due Diligence	
51 b	Transaction Screening	
51 c	Name Screening	
51 d	List Management	
51 e	Training and Education	
51 f	Governance	
51 g	Management Information	
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	
52 a	If N, provide the date when the last Sanctions EWRA was completed.	
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53 b	If appropriate, provide any additional information / context to the answers in this section.	

. KYC	C, CDD and EDD	
54	Does the Entity verify the identity of the customer?	
55	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	
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	
56 b	Customer identification	
56 с	Expected activity	
56 d	Nature of business/employment	
56 e	Product usage	
56 f	Purpose and nature of relationship	
56 g	Source of funds	
56 h	Source of wealth	
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	
57 a1	Are ultimate beneficial owners verified?	
57 b	Authorised signatories (where applicable)	
57 с	Key controllers	
57 d	Other relevant parties	
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	
59	Does the due diligence process result in customers receiving a risk classification?	

60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60 a	Product Usage	
60 b	Geography	
60 c	Business Type/Industry	
60 d	Legal Entity type	
60 e	Adverse Information	
60 f	Other (specify)	
61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	
62	If Y, is this at:	
62 a	Onboarding	
62 b	KYC renewal	
62 c	Trigger event	
63	What is the method used by the Entity to screen for adverse media / negative news?	
64	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
65	If Y, is this at:	
65 a	Onboarding	
65 b	KYC renewal	
65 c	Trigger event	
66	What is the method used by the Entity to screen PEPs?	
67	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?	
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	
68 b	Trigger event	
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	

	Provide Parkets (C.) (C.)	
70	From the list below, which categories of	
1	customers or industries are subject to EDD	
	and/or are restricted, or prohibited by the Entity's	
	FCC programme?	
70 a	Non-account customers	
70 b	Non-resident customers	
70 B	Non-resident customers	
70 c	Shell banks	
70 d	MVTS/ MSB customers	
70 e	PEPs	
70 E	FEFS	
70 f	PEP Related	
70 g	PEP Close Associate	
•		
70 h	Correspondent Banks	
70 11	Correspondent Banks	
70 h1	If EDD or EDD & restricted, does the EDD	
	assessment contain the elements as set out in	
	the Wolfsberg Correspondent Banking	
L	Principles 2014?	
70 i	Arms, defense, military	
	· · · · · · · · · · · · · · · · · · ·	
70 j	Atomic power	
/U J	Atomic power	
70 k	Extractive industries	
70 I	Precious metals and stones	
-		
70	I lawa mulata di abaniti a	
70 m	Unregulated charities	
70 n	Regulated charities	
70 o	Red light business / Adult entertainment	
	rica ngin baomboo, riaan omenammen	
70	New Courses and Consciontions	
70 p	Non-Government Organisations	
70 q	Virtual currencies	
70 r	Marijuana	
	, , , , , , , , , , , , , , , , , , , ,	
70 s	Embassies/Consulates	
10 5	Embassies/Consulates	
70 t	Gambling	
70 u	Payment Service Provider	
	.,	
70 11	Other (specify)	
70 v	Other (specify)	
74	If rootricted provide details of the rootriction	
71	If restricted, provide details of the restriction	
72	Does the Entity perform an additional control or	
· -	quality review on clients subject to EDD?	
70		
73	Confirm that all responses provided in the above	
	Section KYC, CDD and EDD are representative	
1	of all the LE's branches	
73 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to	
	2 2.1.2 2.1.2 2.1.2 2.0 4.1.0 app.130 to	
1		
73 b	If appropriate, provide any additional information	
1	/ context to the answers in this section.	

8. MO	NITORING & REPORTING	
74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	
75	What is the method used by the Entity to monitor transactions for suspicious activities?	
76	If manual or combination selected, specify what type of transactions are monitored manually	
77	Does the Entity have regulatory requirements to report suspicious transactions?	
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
79 b	If appropriate, provide any additional information / context to the answers in this section.	

MENT TRANSPARENCY	
Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	
Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
FATF Recommendation 16	
Local Regulations	
Specify the regulation	
If N, explain	
Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	
Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	
Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?	
Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY 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.	
	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: FATF Recommendation 16 Local Regulations Specify the regulation If N, explain Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages? Does the Entity have controls to support the inclusion of required beneficiary information international payment messages? Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY 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.

10. SA	NCTIONS	
86	Does the Entity have a Sanctions Policy	
00	approved by management regarding	
	, , , ,	
	compliance with sanctions law applicable to the	
	Entity, including with respect its business	
	conducted with, or through accounts held at	
	foreign financial institutions?	
87	Does the Entity have policies, procedures, or	
01	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)?	
88	Does the Entity have policies, procedures or	
00	' ''	
	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?	
89	Does the Entity screen its customers, including	
33		
	beneficial ownership information collected by the	
	Entity, during onboarding and regularly	
	thereafter against Sanctions Lists?	
90	What is the method used by the Entity?	
91	Does the Entity screen all sanctions relevant	
31		
	data, including at a minimum, entity and location	
	information, contained in cross border	
	transactions against Sanctions Lists?	
92	What is the method used by the Entity?	
	, , , , , , , , , , , , , , , , , , , ,	
93	Select the Sanctions Lists used by the Entity in	
	its sanctions screening processes:	
93 a	Consolidated United Nations Security Council	
00 u	Sanctions List (UN)	
93 b	United States Department of the Treasury's	
93 D		
	Office of Foreign Assets Control (OFAC)	
93 c	Office of Financial Sanctions Implementation	
	HMT (OFSI)	
93 d	European Union Consolidated List (EU)	
93 e	Lists maintained by other G7 member countries	
93 f	Other (specify)	
	'' ''	
94	Question removed	
95	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:	
05.0	, , , , , , , , , , , , , , , , , , ,	
95 a	Customer Data	
95 b	Transactions	

	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	

	AINING & EDUCATION	
98	Does the Entity provide mandatory training, which includes :	
98 a	Identification and reporting of transactions to government authorities	
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	
98 e	Conduct and Culture	
99	Is the above mandatory training provided to :	
99 a	Board and Senior Committee Management	
99 b	1st Line of Defence	
99 с	2nd Line of Defence	
99 d	3rd Line of Defence	
99 e	3rd parties to which specific FCC activities have been outsourced	
99 f	Non-employed workers (contractors/consultants)	
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	
101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
102 b	If appropriate, provide any additional information / context to the answers in this section.	

12. QU	ALITY ASSURANCE /COMPLIANCE TESTI	NG
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
105 b	If appropriate, provide any additional information / context to the answers in this section.	

13. AUE	DIT	
106	In addition to inspections by the government	
106		
	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 and Sanctions policies and	
	practices on a regular basis?	
107	How often is the Entity audited on its AML, CTF	
	& Sanctions programme by the following:	
107 a	Internal Audit Department	
107 b	External Third Party	
108	Does the internal audit function or other	
	independent third party cover the following	
	areas:	
108 a	AML, CTF & Sanctions policy and procedures	
100 a	Aivie, 611 & Sanctions policy and procedures	
108 b	KYC / CDD / EDD and underlying	
	methodologies	
108 c	Transaction Monitoring	
108 d	Transaction Screening including for sanctions	
	g and g and g	
108 e	Name Screening & List Management	
108 f	Training & Education	
.00 .	Training & Education	
108 g	Technology	
108 h	Governance	
108 i	Reporting/Metrics & Management Information	
400 :	Consistent Astrik Filips	
108 j	Suspicious Activity Filing	
108 k	Enterprise Wide Risk Assessment	
	Zine-price vide view vicecountri	
108 I	Other (specify)	
1001	Other (Specify)	
109	Are adverse findings from internal & external	
	audit tracked to completion and assessed for	
	adequacy and completeness?	
110	Confirm that all responses provided in the above	
-	section, AUDIT are representative of all the LE's	
	branches	
110 a	If N, clarify which questions the difference/s	
1 1 U a	relate to and the branch/es that this applies to.	
	Totale to and the braneness that this applies to.	
110 b	If appropriate, provide any additional information	
	/ context to the answers in this section.	

Declaration Statement Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2020 (CBDDQ V1.3) 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) (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 egal 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 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 thisWolfsberg CBDDQ will be kept current and will be updated no less frequently than on an annual basis. The Financial Institution commits to file accurate supplemental information on a timely basis. (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. (MLRO 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. 01 August 2022 (Signature & Date) (Signature & Date)

the Wolfsberg Group

Einancial	Institution	Namo
rinanciai	institution	Name

Banco Bilbao Vizcaya Argentaria, S.A. ("BBVA.")

Location (Country):

Singapore

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer
1. ENT	ITY & OWNERSHIP	
1	Full Legal Name	Banco Bilbao Vizcaya Argentaria, S.A.
2	Append a list of foreign branches which are covered by this questionnaire	Singapore branch
3	Full Legal (Registered) Address	80 Raffles Place, #55-02 UOB Plaza 1, Singapore 048624.
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/ establishment	28/03/2006
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	Name of primary financial regulator / supervisory authority	Monetary Authority of Singapore

10	Provide Legal Entity Identifier (LEI) if available	
11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	
12	Jurisdiction of licensing authority and regulator of ultimate parent	
13	Select the business areas applicable to the Entity	
13 a	Retail Banking	No
13 b	Private Banking / Wealth Management	No
13 c	Commercial Banking	
13 d	Transactional Banking	
13 e	Investment Banking	
13 f	Financial Markets Trading	
13 g	Securities Services / Custody	No
13 h	Broker / Dealer	No
13 i	Multilateral Development Bank	No
13 j	Other	
14 14 a	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided.) If Y, provide the top five countries where the non-resident customers are located.	Yes Hong Kong, Australia, Ireland, Korea, USA.
15	Select the closest value:	
15 a	Number of employees	1-50
15 b	Total Assets	Greater than \$500 million
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	18
16 b	If appropriate, provide any additional information / context to the answers in this section.	14 and 14 (a) data are both based on position of as 9 30 Jun 2022

17	DUCTS & SERVICES Does the Entity offer the following products and	
,	services:	
7 a	Correspondent Banking	No
7 a1	IfY	
7 a2	Does the Entity offer Correspondent Banking	
17 a3	services to domestic banks? Does the Entity allow domestic bank clients to	
17 a4	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	
7 a5	Does the Entity offer correspondent banking services to Foreign Banks?	
7 a6	Does the Entity allow downstream relationships with Foreign Banks?	
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?	
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?	
17 b	Private Banking (domestic & international)	No
17 c	Trade Finance	
17 d	Payable Through Accounts	
17 e	Stored Value Instruments	No
17 f	Cross Border Bulk Cash Delivery	
17 g	Domestic Bulk Cash Delivery	
17 h	International Cash Letter	No
17 i	Remote Deposit Capture	
17 j	Virtual /Digital Currencies	
17 k	Low Price Securities	
17 1	Hold Mail	No
17 m	Cross Border Remittances	
17 n	Service to walk-in customers (non-account holders)	No
17 o	Sponsoring Private ATMs	
17 p	Other high risk products and services identified by the Entity	
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18 b	If appropriate, provide any additional information / context to the answers in this section.	



19	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
19 a	Appointed Officer with sufficient experience/expertise	
9 b	Cash Reporting	No
9 c	CDD	
9 d	EDD	
19 e	Beneficial Ownership	
19 f	Independent Testing	
19 g	Periodic Review	
19 h	Policies and Procedures	
19 i	Risk Assessment	
19 j	Sanctions	
19 k	PEP Screening	
19 I	Adverse Information Screening	
19 m	Suspicious Activity Reporting	
19 n	Training and Education	
19 o	Transaction Monitoring	
20	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	Less than 10
21	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	
22	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	
23	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes
23 a	If Y, provide further details	
24	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	
24 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
24 b	If appropriate, provide any additional information / context to the answers in this section.	19b - The branch doesn't deal with cash

25	T BRIBERY & CORRUPTION Has the Entity documented policies and	
	procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	
26	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	
27	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	
28	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	
29	Is the Entity's ABC programme applicable to:	
30	Does the Entity have a global ABC policy that:	
30 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	
30 b	Includes enhanced requirements regarding interaction with public officials?	
30 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	
32	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	
33	Does the Entity perform an Enterprise Wide ABC risk assessment?	
33 a	If Y select the frequency	
34	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	
35	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
35 a	Potential liability created by intermediaries and other third-party providers as appropriate	
35 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	
35 с	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	
35 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	
35 е	Changes in business activities that may materially increase the Entity's corruption risk	No
36	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	

37	Does the Entity provide mandatory ABC training to:	
37 a	Board and senior Committee Management	
37 b	1st Line of Defence	
37 c	2nd Line of Defence	
37 d	3rd Line of Defence	
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	
37 f	Non-employed workers as appropriate (contractors/consultants)	
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
39 b	If appropriate, provide any additional information / context to the answers in this section.	

Page 6

	, CTF & SANCTIONS POLICIES & PROCED	UNLO
10	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to	
	reasonably prevent, detect and report:	
10 a	Money laundering	
10 Ь	Terrorist financing	
10 с	Sanctions violations	
41	Are the Entity's policies and procedures updated at least annually?	
42	Are the Entity's policies and procedures gapped against/compared to:	
12 a	US Standards	
12 a1	If Y, does the Enlity retain a record of the results?	
42 b	EU Standards	
42 b1	If Y, does the Entity retain a record of the results?	
43	Does the Entity have policies and procedures that:	
43 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	
43 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	
43 с	Prohibit dealing with other entities that provide banking services to unlicensed banks	
43 d	Prohibit accounts/relationships with shell banks	
43 e	Prohibit dealing with another entity that provides services to shell banks	
43 f	Prohibit opening and keeping of accounts for Section 311 designated entities	
43 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	
43 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	
43 i	Define escalation processes for financial crime risk issues	
43 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	
43 k	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	
43 1	Outline the processes regarding screening for sanctions, PEPs and negative media	
43 m	Outline the processes for the maintenance of internal "watchlists"	
44	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	
45	Does the Entity have a record retention procedures that comply with applicable laws?	
45 a	If Y, what is the retention period?	
46	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	
46 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
46 b	If appropriate, provide any additional information / context to the answers in this section.	

47	Does the Entity's AML & CTF EWRA cover the	
	inherent risk components detailed below:	
47 a	Client	
47 b	Product	
47 c	Channel	
47 d	Geography	
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	
48 b	Customer Due Diligence	
48 c	PEP Identification	
48 d	Transaction Screening	
48 e	Name Screening against Adverse Media & Negative News	
48 f	Training and Education	
48 g	Governance	
48 h	Management Information	
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	
50 b	Product	
50 c	Channel	
50 d	Geography	

51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
51 a	Customer Due Diligence	
51 b	Transaction Screening	
51 c	Name Screening	
51 d	List Management	
51 e	Training and Education	
51 f	Governance	
51 g	Management Information	
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	
52 a	If N, provide the date when the last Sanctions EWRA was completed.	
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53 b	If appropriate, provide any additional information / context to the answers in this section.	

54	C, CDD and EDD Does the Entity verify the identity of the	
	customer?	
55	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	
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	
56 b	Customer identification	
56 c	Expected activity	
56 d	Nature of business/employment	
56 e	Product usage	
56 f	Purpose and nature of relationship	
56 g	Source of funds	
56 h	Source of wealth	
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	
57 a1	Are ultimate beneficial owners verified?	
57 b	Authorised signatories (where applicable)	
57 c	Key controllers	
57 d	Other relevant parties	
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	
59	Does the due diligence process result in customers receiving a risk classification?	

60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60 a	Product Usage	
60 b	Geography	
60 c	Business Type/Industry	
60 d	Legal Entity type	
60 e	Adverse Information	
60 f	Other (specify)	
61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	
62	If Y, is this at:	
62 a	Onboarding	
62 b	KYC renewal	
62 c	Trigger event	
63	What is the method used by the Entity to screen for adverse media / negative news?	
64	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
65	If Y, is this at:	
65 a	Onboarding	
65 b	KYC renewal	
65 c	Trigger event	
66	What is the method used by the Entity to screen PEPs?	
67	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?	
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	
68 b	Trigger event	
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	

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	
70 a	FCC programme? Non-account customers	
70 b	Non-resident customers	
70 c	Shell banks	
70 d	MVTS/ MSB customers	Do not have this category of customer or industry
70 e	PEPs	
70 f	PEP Related	
70 g	PEP Close Associate	
70 h	Correspondent Banks	
70 h1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	
70 i	Arms, defense, military	
70 j	Atomic power	
70 k	Extractive industries	
70 1	Precious metals and stones	Do not have this category of customer or industry
70 m	Unregulated charities	
70 n	Regulated charities	Do not have this category of customer or industry
70 o	Red light business / Adult entertainment	Do not have this category of customer or industry
70 p	Non-Government Organisations	Do not have this category of customer or industry
70 q	Virtual currencies	Do not have this category of customer or industry
70 r	Marijuana	Do not have this category of customer or industry
70 s	Embassies/Consulates	Do not have this category of customer or industry
70 t	Gambling	Do not have this category of customer or industry
70 u	Payment Service Provider	Do not have this category of customer or industry
70 v	Other (specify)	
71	If restricted, provide details of the restriction	
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	
73 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
73 b	If appropriate, provide any additional information / context to the answers in this section.	

1000	NITORING & REPORTING	
74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	
75	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
76	If manual or combination selected, specify what type of transactions are monitored manually	Trade Finance related transactions are monitored manually for suspicious activity by subjecting bill of ladings for sample verifications (on a risk based approach), monitoring of vessel voyage movements, due diligence on counterparties involved, subjecting the transaction to market price checks
77	Does the Entity have regulatory requirements to report suspicious transactions?	
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
79 b	If appropriate, provide any additional information / context to the answers in this section.	

80	Does the Entity adhere to the Wolfsberg Group	
	Payment Transparency Standards?	
81	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
81 a	FATF Recommendation 16	
81 b	Local Regulations	
81 b1	Specify the regulation	MAS Notice 626 - Paragraph 11
81 c	If N, explain	
82	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	
83	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	
84	Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?	
85	Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	
35 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
35 b	If appropriate, provide any additional information / context to the answers in this section.	

10. SA	NCTIONS	
86	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions?	
87	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)?	
88	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?	
89	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	
90	What is the method used by the Enlity?	Combination of automated and manual
91	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	
92	What is the method used by the Entity?	
93	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
93 a	Consolidated United Nations Security Council Sanctions List (UN)	
93 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	
93 с	Office of Financial Sanctions Implementation HMT (OFSI)	
93 d	European Union Consolidated List (EU)	
93 е	Lists maintained by other G7 member countries	
93 f	Other (specify)	MAS Alert List and Payment Blocking Order list under Remote Gambling Act
94	Question removed	
95	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:	
95 a	Customer Data	
95 b	Transactions	

96	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	

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98	Does the Entity provide mandatory training, which includes :	
98 a	Identification and reporting of transactions to government authorities	
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	
98 e	Conduct and Culture	
99	Is the above mandatory training provided to :	
99 a	Board and Senior Committee Management	
99 b	1st Line of Defence	
99 с	2nd Line of Defence	
99 d	3rd Line of Defence	
99 е	3rd parties to which specific FCC activities have been outsourced	
99 f	Non-employed workers (contractors/consultants)	
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	
101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
102 b	If appropriate, provide any additional information / context to the answers in this section.	

103	Are the Entity's KYC processes and documents subject to quality assurance testing?	
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
105 b	If appropriate, provide any additional information / context to the answers in this section.	

13. AU	DIT	
106	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 and Sanctions policies and practices on a regular basis?	
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:	
107 a	Internal Audit Department	
107 b	External Third Party	
108	Does the internal audit function or other independent third party cover the following areas:	
108 a	AML, CTF & Sanctions policy and procedures	
108 b	KYC / CDD / EDD and underlying methodologies	
108 c	Transaction Monitoring	
108 d	Transaction Screening including for sanctions	
108 e	Name Screening & List Management	
108 f	Training & Education	
108 g	Technology	
108 h	Governance	
108 i	Reporting/Metrics & Management Information	
108 j	Suspicious Activity Filing	
108 k	Enterprise Wide Risk Assessment	
108 I	Other (specify)	
109	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	
110	Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches	
110 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110 b	If appropriate, provide any additional information / context to the answers in this section.	

Declaration Statement Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2020 (CBDDQ V1.3) Wolszeig Globy Correspondent barishing Due Enligetice Questioninale 2220 (Coston 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) (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 thisWolfsberg CBDDQ will be kept current and will be updated no less frequently than on an annual basis. The Financial Institution commits to file accurate supplemental information on a timely basis. Michael Brennan (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 Viswanathan Subramanian (MLRO 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! am authorised to execute this declaration on behalf of the Financial Institution. The Hon Michael Andres MAS Brewon Simon BRENNAN (Signature & Date) 2022.07.26 23:05:33 +08'00' (Signature & Date)

the Wolfsberg Group

Financial Institution Name:	
Location (Country) :	

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer
1. ENT	TY & 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	
0 a i	symbol	
6 b	Member Owned/ Mutual	
6 c	Government or State Owned by 25% or more	
0.0	Government of State Owned by 25% of filore	
6 d	Privately Owned	
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
	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	Name of primary financial regulator / supervisory	
	authority	
Ļ	Ļ	

10	Provide Legal Entity Identifier (LEI) if available	
11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	
12	Jurisdiction of licensing authority and regulator of ultimate parent	
13	Select the business areas applicable to the Entity	
13 a	Retail Banking	
13 b	Private Banking / Wealth Management	
13 c	Commercial Banking	
13 d	Transactional Banking	
13 e	Investment Banking	
13 f	Financial Markets Trading	
13 g	Securities Services / Custody	
13 h	Broker / Dealer	
13 i	Multilateral Development Bank	
13 ј	Other	
14	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided.)	
14 a	If Y, provide the top five countries where the non-resident customers are located.	
15	Select the closest value:	
15 a	Number of employees	
15 b	Total Assets	
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
16 b	If appropriate, provide any additional information / context to the answers in this section.	

2. PROI	DUCTS & SERVICES	
17	Does the Entity offer the following products and	
	services:	
17 a	Correspondent Banking	
17 a1	If Y	
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?	
17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?	
17 a4	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?	
17 a6	Does the Entity allow downstream relationships with Foreign Banks?	
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?	
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?	
17 b	Private Banking (domestic & international)	
17 c	Trade Finance	
17 d	Payable Through Accounts	
17 e	Stored Value Instruments	
17 f	Cross Border Bulk Cash Delivery	
17 g	Domestic Bulk Cash Delivery	
17 h	International Cash Letter	
17 i	Remote Deposit Capture	
17 j	Virtual /Digital Currencies	
17 k	Low Price Securities	
17 I	Hold Mail	
17 m	Cross Border Remittances	
17 n	Service to walk-in customers (non-account holders)	
17 o	Sponsoring Private ATMs	
17 p	Other high risk products and services identified by the Entity	
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18 b	If appropriate, provide any additional information / context to the answers in this section.	

3. AML,	CTF & SANCTIONS PROGRAMME	
19	Does the Entity have a programme that sets	
	minimum AML, CTF and Sanctions standards regarding the following components:	
19 a	Appointed Officer with sufficient experience/expertise	
19 b	Cash Reporting	
19 с	CDD	
19 d	EDD	
19 e	Beneficial Ownership	
19 f	Independent Testing	
19 g	Periodic Review	
19 h	Policies and Procedures	
19 i	Risk Assessment	
19 ј	Sanctions	
19 k	PEP Screening	
19 I	Adverse Information Screening	
19 m	Suspicious Activity Reporting	
19 n	Training and Education	
19 o	Transaction Monitoring	
20	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	
21	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	
22	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	
23	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	
23 a	If Y, provide further details	
24	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	
24 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
24 b	If appropriate, provide any additional information / context to the answers in this section.	

4. ANTI	BRIBERY & CORRUPTION	
25	Has the Entity documented policies and	
23	procedures consistent with applicable ABC	
	regulations and requirements to [reasonably]	
	prevent, detect and report bribery and	
	corruption?	
26	Does the Entity have an enterprise wide	
20	programme that sets minimum ABC standards?	
27	Has the Entity appointed a designated officer or	
21	officers with sufficient experience/expertise	
	responsible for coordinating the ABC	
	programme?	
28	Does the Entity have adequate staff with	
	appropriate levels of experience/expertise to	
	implement the ABC programme?	
29	Is the Entity's ABC programme applicable to:	
30	Does the Entity have a global ABC policy that:	
30 a	Prohibits the giving and receiving of bribes?	
1	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	
30 b	Includes enhanced requirements regarding	
	interaction with public officials?	
30 c	Includes a prohibition against the falsification of	
30 0	books and records (this may be within the ABC	
	policy or any other policy applicable to the Legal	
	Entity)?	
31		
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	
32	Does the Entity's Board or Senior Management	
	Committee receive regular Management	
	Information on ABC matters?	
33	Does the Entity perform an Enterprise Wide	
	ABC risk assessment?	
33 a	If Y select the frequency	
34	Does the Entity have an ABC residual risk rating	
	that is the net result of the controls effectiveness	
	and the inherent risk assessment?	
35	Does the Entity's ABC EWRA cover the inherent	
	risk components detailed below:	
05 -	Detected Paker and the Control of th	
35 a	Potential liability created by intermediaries and	
L	other third-party providers as appropriate	
35 b	Corruption risks associated with the countries	
	and industries in which the Entity does business,	
	directly or through intermediaries	
35 c	Transactions, products or services, including	
1	those that involve state-owned or state-	
	controlled entities or public officials	
35 d	Corruption risks associated with gifts and	
-	hospitality, hiring/internships, charitable	
	donations and political contributions	
35 e	Changes in business activities that may	
33 C	materially increase the Entity's corruption risk	
20		
36	Does the Entity's internal audit function or other	
	independent third party cover ABC Policies and	
	Procedures?	

37	Does the Entity provide mandatory ABC training to:	
37 a	Board and senior Committee Management	
37 b	1st Line of Defence	
37 с	2nd Line of Defence	
37 d	3rd Line of Defence	
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	
37 f	Non-employed workers as appropriate (contractors/consultants)	
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
39 b	If appropriate, provide any additional information / context to the answers in this section.	

	CTF & SANCTIONS POLICIES & PROCEI	JUKES
40	Has the Entity documented policies and	
	procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to	
	reasonably prevent, detect and report:	
40 a	Money laundering	
40 b	Terrorist financing	
40 с	Sanctions violations	
41	Are the Entity's policies and procedures updated	
40	at least annually?	
42	Are the Entity's policies and procedures gapped against/compared to:	
42 a	US Standards	
42 a1	If Y, does the Entity retain a record of the results?	
42 b	EU Standards	
42 b1	If Y, does the Entity retain a record of the results?	
43	Does the Entity have policies and procedures that:	
43 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	
43 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	
43 c	Prohibit dealing with other entities that provide	
43 d	banking services to unlicensed banks Prohibit accounts/relationships with shell banks	
43 e	Prohibit dealing with another entity that provides	
43 f	services to shell banks Prohibit opening and keeping of accounts for	
	Section 311 designated entities	
43 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio,	
43 h	bureaux de change or money transfer agents	
43 N	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	
43 i	Define escalation processes for financial crime risk issues	
43 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	
43 k	Specify how potentially suspicious activity	
	identified by employees is to be escalated and investigated	
43 I	Outline the processes regarding screening for sanctions, PEPs and negative media	
43 m	Outline the processes for the maintenance of internal "watchlists"	
44	Has the Entity defined a risk tolerance statement or similar document which defines a risk	
45	boundary around their business? Does the Entity have a record retention	
4E o	procedures that comply with applicable laws?	
45 a	If Y, what is the retention period?	
46	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	
46 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
46 b	If appropriate, provide any additional information	

6. AML	, CTF & SANCTIONS RISK ASSESSMENT	
47	Does the Entity's AML & CTF EWRA cover the	
**	inherent risk components detailed below:	
47 a	Client	
47 b	Product	
47 c	Channel	
47 d	Geography	
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	
48 b	Customer Due Diligence	
48 c	PEP Identification	
48 d	Transaction Screening	
48 e	Name Screening against Adverse Media & Negative News	
48 f	Training and Education	
48 g	Governance	
48 h	Management Information	
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	
50 b	Product	
50 с	Channel	
50 d	Geography	

51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
51 a	Customer Due Diligence	
51 b	Transaction Screening	
51 c	Name Screening	
51 d	List Management	
51 e	Training and Education	
51 f	Governance	
51 g	Management Information	
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	
52 a	If N, provide the date when the last Sanctions EWRA was completed.	
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53 b	If appropriate, provide any additional information / context to the answers in this section.	

. KYC	C, CDD and EDD	
54	Does the Entity verify the identity of the customer?	
55	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	
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	
56 b	Customer identification	
56 с	Expected activity	
56 d	Nature of business/employment	
56 e	Product usage	
56 f	Purpose and nature of relationship	
56 g	Source of funds	
56 h	Source of wealth	
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	
57 a1	Are ultimate beneficial owners verified?	
57 b	Authorised signatories (where applicable)	
57 с	Key controllers	
57 d	Other relevant parties	
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	
59	Does the due diligence process result in customers receiving a risk classification?	

60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60 a	Product Usage	
60 b	Geography	
60 c	Business Type/Industry	
60 d	Legal Entity type	
60 e	Adverse Information	
60 f	Other (specify)	
61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	
62	If Y, is this at:	
62 a	Onboarding	
62 b	KYC renewal	
62 c	Trigger event	
63	What is the method used by the Entity to screen for adverse media / negative news?	
64	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
65	If Y, is this at:	
65 a	Onboarding	
65 b	KYC renewal	
65 c	Trigger event	
66	What is the method used by the Entity to screen PEPs?	
67	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?	
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	
68 b	Trigger event	
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	

	Provide Parkets (C.) (C.)	
70	From the list below, which categories of	
1	customers or industries are subject to EDD	
	and/or are restricted, or prohibited by the Entity's	
	FCC programme?	
70 a	Non-account customers	
70 b	Non-resident customers	
70 B	Non-resident customers	
70 c	Shell banks	
70 d	MVTS/ MSB customers	
70 e	PEPs	
70 E	FEFS	
70 f	PEP Related	
70 g	PEP Close Associate	
•		
70 h	Correspondent Banks	
70 11	Correspondent Banks	
70 h1	If EDD or EDD & restricted, does the EDD	
	assessment contain the elements as set out in	
	the Wolfsberg Correspondent Banking	
L	Principles 2014?	
70 i	Arms, defense, military	
	· · · · · · · · · · · · · · · · · · ·	
70 j	Atomic power	
/U J	Atomic power	
70 k	Extractive industries	
70 I	Precious metals and stones	
-		
70	I lawa mulata di abaniti a	
70 m	Unregulated charities	
70 n	Regulated charities	
70 o	Red light business / Adult entertainment	
	rica ngin baomboo, riaan omenammen	
70	New Courses and Consciontions	
70 p	Non-Government Organisations	
70 q	Virtual currencies	
70 r	Marijuana	
	, , , , , , , , , , , , , , , , , , , ,	
70 s	Embassies/Consulates	
10 5	Embassies/Consulates	
70 t	Gambling	
70 u	Payment Service Provider	
	.,	
70 11	Other (specify)	
70 v	Other (specify)	
74	If rootricted provide details of the rootriction	
71	If restricted, provide details of the restriction	
72	Does the Entity perform an additional control or	
· -	quality review on clients subject to EDD?	
70		
73	Confirm that all responses provided in the above	
	Section KYC, CDD and EDD are representative	
1	of all the LE's branches	
73 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to	
	2 2.1.2 2.1.2 2.1.2 2.0 4.1.0 app.100 to	
1		
73 b	If appropriate, provide any additional information	
1	/ context to the answers in this section.	

8. MO	NITORING & REPORTING	
74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	
75	What is the method used by the Entity to monitor transactions for suspicious activities?	
76	If manual or combination selected, specify what type of transactions are monitored manually	
77	Does the Entity have regulatory requirements to report suspicious transactions?	
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
79 b	If appropriate, provide any additional information / context to the answers in this section.	

MENT TRANSPARENCY	
Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	
Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
FATF Recommendation 16	
Local Regulations	
Specify the regulation	
If N, explain	
Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	
Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	
Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?	
Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY 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.	
	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: FATF Recommendation 16 Local Regulations Specify the regulation If N, explain Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages? Does the Entity have controls to support the inclusion of required beneficiary information international payment messages? Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY 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.

10. SA	NCTIONS	
86	Does the Entity have a Sanctions Policy	
00	approved by management regarding	
	, , , , ,	
	compliance with sanctions law applicable to the	
	Entity, including with respect its business	
	conducted with, or through accounts held at	
	foreign financial institutions?	
87	Does the Entity have policies, procedures, or	
01	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)?	
88	Does the Entity have policies, procedures or	
00	' ''	
	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?	
89	Does the Entity screen its customers, including	
33		
	beneficial ownership information collected by the	
	Entity, during onboarding and regularly	
	thereafter against Sanctions Lists?	
90	What is the method used by the Entity?	
91	Does the Entity screen all sanctions relevant	
31		
	data, including at a minimum, entity and location	
	information, contained in cross border	
	transactions against Sanctions Lists?	
92	What is the method used by the Entity?	
	, , , , , , , , , , , , , , , , , , , ,	
93	Select the Sanctions Lists used by the Entity in	
	its sanctions screening processes:	
93 a	Consolidated United Nations Security Council	
00 u	Sanctions List (UN)	
93 b	United States Department of the Treasury's	
93 D		
	Office of Foreign Assets Control (OFAC)	
93 c	Office of Financial Sanctions Implementation	
	HMT (OFSI)	
93 d	European Union Consolidated List (EU)	
93 e	Lists maintained by other G7 member countries	
93 f	Other (specify)	
	'' ''	
94	Question removed	
95	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:	
05.0	, , , , , , , , , , , , , , , , , , ,	
95 a	Customer Data	
95 b	Transactions	

	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	

	AINING & EDUCATION	
98	Does the Entity provide mandatory training, which includes :	
98 a	Identification and reporting of transactions to government authorities	
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	
98 e	Conduct and Culture	
99	Is the above mandatory training provided to :	
99 a	Board and Senior Committee Management	
99 b	1st Line of Defence	
99 с	2nd Line of Defence	
99 d	3rd Line of Defence	
99 e	3rd parties to which specific FCC activities have been outsourced	
99 f	Non-employed workers (contractors/consultants)	
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	
101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
102 b	If appropriate, provide any additional information / context to the answers in this section.	

12. QU	ALITY ASSURANCE /COMPLIANCE TESTI	NG
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
105 b	If appropriate, provide any additional information / context to the answers in this section.	

13. AUE	DIT	
106	In addition to inspections by the government	
106		
	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 and Sanctions policies and	
	practices on a regular basis?	
107	How often is the Entity audited on its AML, CTF	
	& Sanctions programme by the following:	
107 a	Internal Audit Department	
107 b	External Third Party	
108	Does the internal audit function or other	
	independent third party cover the following	
	areas:	
108 a	AML, CTF & Sanctions policy and procedures	
100 a	Aivie, 611 & Sanctions policy and procedures	
108 b	KYC / CDD / EDD and underlying	
	methodologies	
108 c	Transaction Monitoring	
108 d	Transaction Screening including for sanctions	
	g and g and g	
108 e	Name Screening & List Management	
108 f	Training & Education	
.00 .	Training & Education	
108 g	Technology	
108 h	Governance	
108 i	Reporting/Metrics & Management Information	
400 :	Consistent Astrik Filips	
108 j	Suspicious Activity Filing	
108 k	Enterprise Wide Risk Assessment	
	Zine-price vide view vicecountri	
108 I	Other (specify)	
1001	Other (Specify)	
109	Are adverse findings from internal & external	
	audit tracked to completion and assessed for	
	adequacy and completeness?	
110	Confirm that all responses provided in the above	
-	section, AUDIT are representative of all the LE's	
	branches	
110 a	If N, clarify which questions the difference/s	
1 1 U a	relate to and the branch/es that this applies to.	
	Totale to and the braneness that this applies to.	
110 b	If appropriate, provide any additional information	
	/ context to the answers in this section.	

Declaration Statement
Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2020 (CBDDQ V1.3) 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)
(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 it 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 Principle The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than on an annual basis.
The Financial Institution commits to file accurate supplemental information on a timely basis.
I,
I, (MLRO 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.
(Signature & Date)
(Signature & Date)

the Wolfsberg Group

Financial Institution Name:	
Location (Country) :	

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer
1. ENT	TY & 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	
0 a i	symbol	
6 b	Member Owned/ Mutual	
6 c	Government or State Owned by 25% or more	
0.0	Government of State Owned by 25% of filore	
6 d	Privately Owned	
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
	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	Name of primary financial regulator / supervisory	
	authority	
Ļ	Ļ	

10	Provide Legal Entity Identifier (LEI) if available	
11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	
12	Jurisdiction of licensing authority and regulator of ultimate parent	
13	Select the business areas applicable to the Entity	
13 a	Retail Banking	
13 b	Private Banking / Wealth Management	
13 c	Commercial Banking	
13 d	Transactional Banking	
13 e	Investment Banking	
13 f	Financial Markets Trading	
13 g	Securities Services / Custody	
13 h	Broker / Dealer	
13 i	Multilateral Development Bank	
13 ј	Other	
14	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided.)	
14 a	If Y, provide the top five countries where the non-resident customers are located.	
15	Select the closest value:	
15 a	Number of employees	
15 b	Total Assets	
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
16 b	If appropriate, provide any additional information / context to the answers in this section.	

2. PROI	DUCTS & SERVICES	
17	Does the Entity offer the following products and	
	services:	
17 a	Correspondent Banking	
17 a1	If Y	
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?	
17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?	
17 a4	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?	
17 a6	Does the Entity allow downstream relationships with Foreign Banks?	
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?	
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?	
17 b	Private Banking (domestic & international)	
17 c	Trade Finance	
17 d	Payable Through Accounts	
17 e	Stored Value Instruments	
17 f	Cross Border Bulk Cash Delivery	
17 g	Domestic Bulk Cash Delivery	
17 h	International Cash Letter	
17 i	Remote Deposit Capture	
17 j	Virtual /Digital Currencies	
17 k	Low Price Securities	
17 I	Hold Mail	
17 m	Cross Border Remittances	
17 n	Service to walk-in customers (non-account holders)	
17 o	Sponsoring Private ATMs	
17 p	Other high risk products and services identified by the Entity	
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18 b	If appropriate, provide any additional information / context to the answers in this section.	

3. AML,	CTF & SANCTIONS PROGRAMME	
19	Does the Entity have a programme that sets	
	minimum AML, CTF and Sanctions standards regarding the following components:	
19 a	Appointed Officer with sufficient experience/expertise	
19 b	Cash Reporting	
19 с	CDD	
19 d	EDD	
19 e	Beneficial Ownership	
19 f	Independent Testing	
19 g	Periodic Review	
19 h	Policies and Procedures	
19 i	Risk Assessment	
19 ј	Sanctions	
19 k	PEP Screening	
19 I	Adverse Information Screening	
19 m	Suspicious Activity Reporting	
19 n	Training and Education	
19 o	Transaction Monitoring	
20	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	
21	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	
22	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	
23	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	
23 a	If Y, provide further details	
24	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	
24 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
24 b	If appropriate, provide any additional information / context to the answers in this section.	

4. ANTI	BRIBERY & CORRUPTION	
25	Has the Entity documented policies and	
23	procedures consistent with applicable ABC	
	regulations and requirements to [reasonably]	
	prevent, detect and report bribery and	
	corruption?	
26	Does the Entity have an enterprise wide	
20	programme that sets minimum ABC standards?	
27	Has the Entity appointed a designated officer or	
21	officers with sufficient experience/expertise	
	responsible for coordinating the ABC	
	programme?	
28	Does the Entity have adequate staff with	
	appropriate levels of experience/expertise to	
	implement the ABC programme?	
29	Is the Entity's ABC programme applicable to:	
30	Does the Entity have a global ABC policy that:	
30 a	Prohibits the giving and receiving of bribes?	
1	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	
30 b	Includes enhanced requirements regarding	
	interaction with public officials?	
30 c	Includes a prohibition against the falsification of	
30 0	books and records (this may be within the ABC	
	policy or any other policy applicable to the Legal	
	Entity)?	
31		
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	
32	Does the Entity's Board or Senior Management	
	Committee receive regular Management	
	Information on ABC matters?	
33	Does the Entity perform an Enterprise Wide	
	ABC risk assessment?	
33 a	If Y select the frequency	
34	Does the Entity have an ABC residual risk rating	
	that is the net result of the controls effectiveness	
	and the inherent risk assessment?	
35	Does the Entity's ABC EWRA cover the inherent	
	risk components detailed below:	
05 -	Detected Paker and the Control of th	
35 a	Potential liability created by intermediaries and	
L	other third-party providers as appropriate	
35 b	Corruption risks associated with the countries	
	and industries in which the Entity does business,	
	directly or through intermediaries	
35 c	Transactions, products or services, including	
1	those that involve state-owned or state-	
	controlled entities or public officials	
35 d	Corruption risks associated with gifts and	
-	hospitality, hiring/internships, charitable	
	donations and political contributions	
35 e	Changes in business activities that may	
33 C	materially increase the Entity's corruption risk	
20		
36	Does the Entity's internal audit function or other	
	independent third party cover ABC Policies and	
	Procedures?	

37	Does the Entity provide mandatory ABC training to:	
37 a	Board and senior Committee Management	
37 b	1st Line of Defence	
37 с	2nd Line of Defence	
37 d	3rd Line of Defence	
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	
37 f	Non-employed workers as appropriate (contractors/consultants)	
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
39 b	If appropriate, provide any additional information / context to the answers in this section.	

	CTF & SANCTIONS POLICIES & PROCEI	JUKES
40	Has the Entity documented policies and	
	procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to	
	reasonably prevent, detect and report:	
40 a	Money laundering	
40 b	Terrorist financing	
40 с	Sanctions violations	
41	Are the Entity's policies and procedures updated	
40	at least annually?	
42	Are the Entity's policies and procedures gapped against/compared to:	
42 a	US Standards	
42 a1	If Y, does the Entity retain a record of the results?	
42 b	EU Standards	
42 b1	If Y, does the Entity retain a record of the results?	
43	Does the Entity have policies and procedures that:	
43 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	
43 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	
43 c	Prohibit dealing with other entities that provide	
43 d	banking services to unlicensed banks Prohibit accounts/relationships with shell banks	
43 e	Prohibit dealing with another entity that provides	
43 f	services to shell banks Prohibit opening and keeping of accounts for	
	Section 311 designated entities	
43 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio,	
43 h	bureaux de change or money transfer agents	
43 N	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	
43 i	Define escalation processes for financial crime risk issues	
43 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	
43 k	Specify how potentially suspicious activity	
	identified by employees is to be escalated and investigated	
43 I	Outline the processes regarding screening for sanctions, PEPs and negative media	
43 m	Outline the processes for the maintenance of internal "watchlists"	
44	Has the Entity defined a risk tolerance statement or similar document which defines a risk	
45	boundary around their business? Does the Entity have a record retention	
4E o	procedures that comply with applicable laws?	
45 a	If Y, what is the retention period?	
46	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	
46 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
46 b	If appropriate, provide any additional information	

6. AML	, CTF & SANCTIONS RISK ASSESSMENT	
47	Does the Entity's AML & CTF EWRA cover the	
**	inherent risk components detailed below:	
47 a	Client	
47 b	Product	
47 c	Channel	
47 d	Geography	
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	
48 b	Customer Due Diligence	
48 c	PEP Identification	
48 d	Transaction Screening	
48 e	Name Screening against Adverse Media & Negative News	
48 f	Training and Education	
48 g	Governance	
48 h	Management Information	
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	
50 b	Product	
50 с	Channel	
50 d	Geography	

51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
51 a	Customer Due Diligence	
51 b	Transaction Screening	
51 c	Name Screening	
51 d	List Management	
51 e	Training and Education	
51 f	Governance	
51 g	Management Information	
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	
52 a	If N, provide the date when the last Sanctions EWRA was completed.	
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53 b	If appropriate, provide any additional information / context to the answers in this section.	

. KYC	C, CDD and EDD	
54	Does the Entity verify the identity of the customer?	
55	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	
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	
56 b	Customer identification	
56 с	Expected activity	
56 d	Nature of business/employment	
56 e	Product usage	
56 f	Purpose and nature of relationship	
56 g	Source of funds	
56 h	Source of wealth	
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	
57 a1	Are ultimate beneficial owners verified?	
57 b	Authorised signatories (where applicable)	
57 с	Key controllers	
57 d	Other relevant parties	
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	
59	Does the due diligence process result in customers receiving a risk classification?	

60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60 a	Product Usage	
60 b	Geography	
60 c	Business Type/Industry	
60 d	Legal Entity type	
60 e	Adverse Information	
60 f	Other (specify)	
61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	
62	If Y, is this at:	
62 a	Onboarding	
62 b	KYC renewal	
62 c	Trigger event	
63	What is the method used by the Entity to screen for adverse media / negative news?	
64	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
65	If Y, is this at:	
65 a	Onboarding	
65 b	KYC renewal	
65 c	Trigger event	
66	What is the method used by the Entity to screen PEPs?	
67	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?	
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	
68 b	Trigger event	
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	

	Provide Parkets (C.) (C.)	
70	From the list below, which categories of	
1	customers or industries are subject to EDD	
	and/or are restricted, or prohibited by the Entity's	
	FCC programme?	
70 a	Non-account customers	
70 b	Non-resident customers	
70 B	Non-resident customers	
70 c	Shell banks	
70 d	MVTS/ MSB customers	
70 e	PEPs	
70 E	FEFS	
70 f	PEP Related	
70 g	PEP Close Associate	
•		
70 h	Correspondent Banks	
70 11	Correspondent Banks	
70 h1	If EDD or EDD & restricted, does the EDD	
	assessment contain the elements as set out in	
	the Wolfsberg Correspondent Banking	
L	Principles 2014?	
70 i	Arms, defense, military	
	· · · · · · · · · · · · · · · · · · ·	
70 j	Atomic power	
/U J	Atomic power	
70 k	Extractive industries	
70 I	Precious metals and stones	
-		
70	I lawa mulata di abaniti a	
70 m	Unregulated charities	
70 n	Regulated charities	
70 o	Red light business / Adult entertainment	
	rica ngin baomboo, riaan omenammen	
70	New Courses and Consciontions	
70 p	Non-Government Organisations	
70 q	Virtual currencies	
70 r	Marijuana	
	, , , , , , , , , , , , , , , , , , , ,	
70 s	Embassies/Consulates	
10 5	Embassies/Consulates	
70 t	Gambling	
70 u	Payment Service Provider	
	.,	
70 11	Other (specify)	
70 v	Other (specify)	
74	If rootricted provide details of the rootriction	
71	If restricted, provide details of the restriction	
72	Does the Entity perform an additional control or	
· -	quality review on clients subject to EDD?	
70		
73	Confirm that all responses provided in the above	
	Section KYC, CDD and EDD are representative	
1	of all the LE's branches	
73 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to	
	2 2.1.2 2.1.2 2.1.2 2.0 4.1.0 app.130 to	
1		
73 b	If appropriate, provide any additional information	
1	/ context to the answers in this section.	

8. MO	NITORING & REPORTING	
74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	
75	What is the method used by the Entity to monitor transactions for suspicious activities?	
76	If manual or combination selected, specify what type of transactions are monitored manually	
77	Does the Entity have regulatory requirements to report suspicious transactions?	
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
79 b	If appropriate, provide any additional information / context to the answers in this section.	

MENT TRANSPARENCY	
Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	
Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
FATF Recommendation 16	
Local Regulations	
Specify the regulation	
If N, explain	
Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	
Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	
Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?	
Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY 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.	
	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: FATF Recommendation 16 Local Regulations Specify the regulation If N, explain Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages? Does the Entity have controls to support the inclusion of required beneficiary information international payment messages? Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY 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.

10. SANCTIONS			
86 Does the Entity have a Sanctions Policy			
86	approved by management regarding		
	, , , , ,		
	compliance with sanctions law applicable to the		
	Entity, including with respect its business		
	conducted with, or through accounts held at		
	foreign financial institutions?		
87	Does the Entity have policies, procedures, or		
01	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)?		
88	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?		
89	Does the Entity screen its customers, including		
	beneficial ownership information collected by the		
	Entity, during onboarding and regularly		
	thereafter against Sanctions Lists?		
90	What is the method used by the Entity?		
91	Does the Entity screen all sanctions relevant		
91	data, including at a minimum, entity and location		
	information, contained in cross border		
	transactions against Sanctions Lists?	_	
92	What is the method used by the Entity?		
93	Select the Sanctions Lists used by the Entity in		
	its sanctions screening processes:		
93 a	Consolidated United Nations Security Council		
93 a	· · · · · · · · · · · · · · · · · · ·		
	Sanctions List (UN)		
93 b	United States Department of the Treasury's		
	Office of Foreign Assets Control (OFAC)		
93 с	Office of Financial Sanctions Implementation		
	HMT (OFSI)		
02.4			
93 d	European Union Consolidated List (EU)		
ļ			
93 e	Lists maintained by other G7 member countries		
93 f	Other (specify)		
	1-1 27		
1			
94	Question removed		
05	M/hon regulatory outborides assissing data : (
95	When regulatory authorities make updates to		
1	their Sanctions list, how many business days		
1	before the entity updates their active manual and/		
1	or automated screening systems against:		
95 a	Customer Data		
95 b	Transactions		
~ ~			
1			

	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	

	AINING & EDUCATION	
98	Does the Entity provide mandatory training, which includes :	
98 a	Identification and reporting of transactions to government authorities	
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	
98 e	Conduct and Culture	
99	Is the above mandatory training provided to :	
99 a	Board and Senior Committee Management	
99 b	1st Line of Defence	
99 с	2nd Line of Defence	
99 d	3rd Line of Defence	
99 e	3rd parties to which specific FCC activities have been outsourced	
99 f	Non-employed workers (contractors/consultants)	
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	
101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
102 b	If appropriate, provide any additional information / context to the answers in this section.	

12. QU	ALITY ASSURANCE /COMPLIANCE TESTI	NG
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
105 b	If appropriate, provide any additional information / context to the answers in this section.	

13. AUE	DIT	
106	In addition to inspections by the government	
106		
	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 and Sanctions policies and	
	practices on a regular basis?	
107	How often is the Entity audited on its AML, CTF	
	& Sanctions programme by the following:	
107 a	Internal Audit Department	
107 b	External Third Party	
108	Does the internal audit function or other	
	independent third party cover the following	
	areas:	
108 a	AML, CTF & Sanctions policy and procedures	
100 a	Aivie, 611 & Sanctions policy and procedures	
108 b	KYC / CDD / EDD and underlying	
	methodologies	
108 c	Transaction Monitoring	
108 d	Transaction Screening including for sanctions	
	g and g and g	
108 e	Name Screening & List Management	
108 f	Training & Education	
.00 .	Training & Education	
108 g	Technology	
108 h	Governance	
108 i	Reporting/Metrics & Management Information	
400 :	Consistent Astrik Filips	
108 j	Suspicious Activity Filing	
108 k	Enterprise Wide Risk Assessment	
	Zine-price vide view vicecountri	
108 I	Other (specify)	
1001	Other (Specify)	
109	Are adverse findings from internal & external	
	audit tracked to completion and assessed for	
	adequacy and completeness?	
110	Confirm that all responses provided in the above	
-	section, AUDIT are representative of all the LE's	
	branches	
110 a	If N, clarify which questions the difference/s	
1 1 U a	relate to and the branch/es that this applies to.	
	Totale to and the braneness that this applies to.	
110 b	If appropriate, provide any additional information	
	/ context to the answers in this section.	

Declaration Statement Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2020 (CBDDQ V1.3) 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) (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 egal 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 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 thisWolfsberg CBDDQ will be kept current and will be updated no less frequently than on an annual basis. The Financial Institution commits to file accurate supplemental information on a timely basis. (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. (MLRO 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. (Signature & Date) (Signature & Date)



Assinado por: Jorge Manuel Canha Carvalho Luís Identificação: BI07440544 Data: 2022-07-22 às 12:31:23 Local: Lisbon - Portugal Motivo: Wolfsberg Questionnaire BBVA Portugal

the Wolfsberg Group

Financial Institution Name:	Banco Bilbao Vizcaya Argentaria, S.A.	
	Japan	
Location (Country):	oupun	

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No #	Question	Answer
I. ENT	ITY & OWNERSHIP	
t	Full Legal Name	
2	Append a list of foreign branches which are covered by this questionnaire	Tokyo
3	Full Legal (Registered) Address	Fukoku Seimei Bldg 17F, 2-2-2 Uchisaiwaicho, Chiyoda-ku, Tokyo 100-0011
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/ establishment	1st June, 2005
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	Name of primary financial regulator / supervisory authority	Financial Services Agency

10	Provide Legal Entity Identifier (LEI) if available	
10	Provide Legal Entity Identifier (EEI) II available	
11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	
12	Jurisdiction of licensing authority and regulator of ultimate parent	
13	Select the business areas applicable to the Entity	
13 a	Retail Banking	No
13 b	Private Banking / Wealth Management	No
13 c	Commercial Banking	
13 d	Transactional Banking	No
13 e	Investment Banking	No
13 f	Financial Markets Trading	No
13 g	Securities Services / Custody	No
13 h	Broker / Dealer	No
13 i	Multilateral Development Bank	No
13 j	Other	
14	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided.)	
14 a	If Y, provide the top five countries where the non- resident customers are located.	
15	Select the closest value:	
15 a	Number of employees	1-50
15 b	Total Assets	Between \$10 and \$100 million
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
16 b	If appropriate, provide any additional information / context to the answers in this section.	

TAXABLE PARTY	DUCTS & SERVICES	
7	Does the Entity offer the following products and services:	
7 a	Correspondent Banking	No
17 a1	lf Y	
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?	
17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?	
17 a4	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?	
17 a6	Does the Entity allow downstream relationships with Foreign Banks?	
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?	
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?	
17 b	Private Banking (domestic & international)	No
17 c	Trade Finance	No
17 d	Payable Through Accounts	
17 e	Stored Value Instruments	No
17 f	Cross Border Bulk Cash Delivery	
17 g	Domestic Bulk Cash Delivery	
17 h	International Cash Letter	No
17 i	Remote Deposit Capture	
17 j	Virtual /Digital Currencies	
17 k	Low Price Securities	
17 I	Hold Mail	No
17 m	Cross Border Remittances	No
17 n	Service to walk-in customers (non-account holders)	No
17 o	Sponsoring Private ATMs	
17 p	Other high risk products and services identified by the Entity	
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18 b	If appropriate, provide any additional information / context to the answers in this section.	

	CTF & SANCTIONS PROGRAMME	
19	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
19 a	Appointed Officer with sufficient experience/expertise	
19 b	Cash Reporting	
19 с	CDD	
19 d	EDD	
19 e	Beneficial Ownership	
19 f	Independent Testing	
19 g	Periodic Review	
19 h	Policies and Procedures	
19 i	Risk Assessment	
19 j	Sanctions	
19 k	PEP Screening	
19 [Adverse Information Screening	
19 m	Suspicious Activity Reporting	
19 n	Training and Education	
19 o	Transaction Monitoring	
20	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	Less than 10
21	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	
22	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	
23	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	
23 a	If Y, provide further details	
24	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	
24 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
24 b	If appropriate, provide any additional information / context to the answers in this section.	

4. AN	I BRIBERY & CORRUPTION	
25	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	
26	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	
27	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	
28	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	
29	Is the Entity's ABC programme applicable to:	
30	Does the Entity have a global ABC policy that:	
30 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	
30 b	Includes enhanced requirements regarding interaction with public officials?	
30 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	
32	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	
33	Does the Entity perform an Enterprise Wide ABC risk assessment?	
33 a	If Y select the frequency	
34	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	
35	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
35 a	Potential liability created by intermediaries and other third-party providers as appropriate	
35 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	
35 с	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	
35 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	
35 e	Changes in business activities that may materially increase the Entity's corruption risk	
36	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	

Does the Entity provide mandatory ABC training to:	
Board and senior Committee Management	
1st Line of Defence	
2nd Line of Defence	
3rd Line of Defence	
3rd parties to which specific compliance activities subject to ABC risk have been outsourced	
Non-employed workers as appropriate (contractors/consultants)	
Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	
Confirm that all responses provided in the above Section Anti Bribery & Corruption 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.	
	to: Board and senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence 3rd Line of Defence 3rd parties to which specific compliance activities subject to ABC risk have been outsourced Non-employed workers as appropriate (contractors/consultants) Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities? Confirm that all responses provided in the above Section Anti Bribery & Corruption 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.

5. AML	, CTF & SANCTIONS POLICIES & PROCED	URES
10	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
10 a	Money laundering	
10 b	Terrorist financing	
10 с	Sanctions violations	
11	Are the Entity's policies and procedures updated at least annually?	
12	Are the Entity's policies and procedures gapped against/compared to:	
12 a	US Standards	
12 a1	If Y, does the Entity retain a record of the results?	
42 b	EU Standards	
42 b1	If Y, does the Entity retain a record of the results?	
43	Does the Entity have policies and procedures that:	
43 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	
43 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	
43 с	Prohibit dealing with other entities that provide banking services to unlicensed banks	
43 d	Prohibit accounts/relationships with shell banks	
43 e	Prohibit dealing with another entity that provides services to shell banks	
43 f	Prohibit opening and keeping of accounts for Section 311 designated entities	
43 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	
43 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	
43 i	Define escalation processes for financial crime risk issues	
43 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	
43 k	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	
43 1	Outline the processes regarding screening for sanctions, PEPs and negative media	
43 m	Outline the processes for the maintenance of internal "watchlists"	
44	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	
45	Does the Entity have a record retention procedures that comply with applicable laws?	
45 a	If Y, what is the retention period?	
46	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	
46 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
46 b	If appropriate, provide any additional information / context to the answers in this section.	

47	Does the Entity's AML & CTF EWRA cover the	
	inherent risk components detailed below:	
47 a	Client	
47 b	Product	
47 c	Channel	
47 d	Geography	
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	
48 b	Customer Due Diligence	
48 c	PEP Identification	
48 d	Transaction Screening	
48 e	Name Screening against Adverse Media & Negative News	
48 f	Training and Education	
48 g	Governance	
48 h	Management Information	
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	
50 b	Product	
50 с	Channel	
50 d	Geography	

51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
51 a	Customer Due Diligence	
51 b	Transaction Screening	
51 c	Name Screening	
51 d	List Management	
51 e	Training and Education	
51 f	Governance	
51 g	Management Information	
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	
52 a	If N, provide the date when the last Sanctions EWRA was completed.	
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53 b	If appropriate, provide any additional information / context to the answers in this section.	

7. KY	C, CDD and EDD	
54	Does the Entity verify the identity of the customer?	
55	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	
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	
56 b	Customer identification	
56 с	Expected activity	
56 d	Nature of business/employment	
56 e	Product usage	
56 f	Purpose and nature of relationship	
56 g	Source of funds	
56 h	Source of wealth	
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	
57 a1	Are ultimate beneficial owners verified?	
57 b	Authorised signatories (where applicable)	
57 c	Key controllers	
57 d	Other relevant parties	
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	
59	Does the due diligence process result in customers receiving a risk classification?	

60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60 a	Product Usage	
60 b	Geography	
60 c	Business Type/Industry	
60 d	Legal Entity type	
60 e	Adverse Information	
60 f	Other (specify)	
61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	
62	If Y, is this at:	
62 a	Onboarding	
62 b	KYC renewal	
62 c	Trigger event	
63	What is the method used by the Entity to screen for adverse media / negative news?	
64	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
65	If Y, is this at:	
65 a	Onboarding	
65 b	KYC renewal	
65 с	Trigger event	
66	What is the method used by the Entity to screen PEPs?	
67	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?	
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	
68 b	Trigger event	
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	

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?	
70 a	Non-account customers	
70 b	Non-resident customers	
70 c	Shell banks	
70 d	MVTS/ MSB customers	
70 e	PEPs	
70 f	PEP Related	
70 g	PEP Close Associate	
70 h	Correspondent Banks	
70 h1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	
70 i	Arms, defense, military	
70 j	Atomic power	
70 k	Extractive industries	
70 1	Precious metals and stones	
70 m	Unregulated charities	
70 n	Regulated charities	
70 o	Red light business / Adult entertainment	
70 p	Non-Government Organisations	
70 q	Virtual currencies	
70 r	Marijuana	
70 s	Embassies/Consulates	
70 t	Gambling	
70 u	Payment Service Provider	
70 v	Other (specify)	
71	If restricted, provide details of the restriction	
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	
73 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
73 b	If appropriate, provide any additional information / context to the answers in this section.	

74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	
75	What is the method used by the Entity to monitor transactions for suspicious activities?	
76	If manual or combination selected, specify what type of transactions are monitored manually	
77	Does the Entity have regulatory requirements to report suspicious transactions?	
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
79 b	If appropriate, provide any additional information / context to the answers in this section.	

9. PAY	MENT TRANSPARENCY	
80	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	
81	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
81 a	FATF Recommendation 16	
81 b	Local Regulations	
81 b1	Specify the regulation	
81 c	If N, explain	
82	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	
83	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	
84	Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?	
85	Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	
85 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
85 b	If appropriate, provide any additional information / context to the answers in this section.	

10. SA	NCTIONS	
86	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions?	
87	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)?	
88	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?	
89	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	
90	What is the method used by the Entity?	
91	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	
92	What is the method used by the Entity?	
93	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
93 a	Consolidated United Nations Security Council Sanctions List (UN)	
93 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	
93 с	Office of Financial Sanctions Implementation HMT (OFSI)	
93 d	European Union Consolidated List (EU)	
93 e	Lists maintained by other G7 member countries	
93 f	Other (specify)	
94	Question removed	
95	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:	
95 a	Customer Data	
95 b	Transactions	

96	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	

11. TR	AINING & EDUCATION	
8	Does the Entity provide mandatory training, which includes :	
98 a	Identification and reporting of transactions to government authorities	
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
8 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	
98 e	Conduct and Culture	
99	Is the above mandatory training provided to :	
99 a	Board and Senior Committee Management	
99 b	1st Line of Defence	
99 с	2nd Line of Defence	
99 d	3rd Line of Defence	
99 e	3rd parties to which specific FCC activities have been outsourced	
99 f	Non-employed workers (contractors/consultants)	
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	
101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
102 b	If appropriate, provide any additional information / context to the answers in this section.	

103	Are the Entity's KYC processes and documents subject to quality assurance testing?	
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
105 b	If appropriate, provide any additional information / context to the answers in this section.	

13. AU		
106	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 and Sanctions policies and practices on a regular basis?	
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:	
107 a	Internal Audit Department	
107 b	External Third Party	
108	Does the internal audit function or other independent third party cover the following areas:	
108 a	AML, CTF & Sanctions policy and procedures	
108 b	KYC / CDD / EDD and underlying methodologies	
108 с	Transaction Monitoring	
108 d	Transaction Screening including for sanctions	
108 e	Name Screening & List Management	
108 f	Training & Education	
108 g	Technology	
108 h	Governance	
108 i	Reporting/Metrics & Management Information	
108 j	Suspicious Activity Filing	
108 k	Enterprise Wide Risk Assessment	
108 I	Other (specify)	
109	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	
110	Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches	
110 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110 b	If appropriate, provide any additional information / context to the answers in this section.	

Declaration Statement	
	nce Questionnaire 2020 (CBDDQ V1.3) If of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Blobal Head of Financial Crimes Compliance OR equivalent)
Banco Bilbao Vizcaya Argentaria, S.A.	
every effort to remain in full compliance with all applic	(Financial Institution name) is fully committed to the fight against financial crime and makes cable 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 impolegal and regulatory obligations.	ortance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its
The Financial Institution recognises the Importance o standards.	of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these
	vith / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles ill be kept current and will be updated no less frequently than on an annual basis.
The Financial Institution commits to file accurate supp	plemental information on a timely basis.
I, the answers provided in this Wolfsberg CBDDQ are of Institution.	(Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial
Akihiro Kato	(MLRO 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 h	onest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.
	(Signature & Date)
Och de la Ace	2025
WANT ITTELY	FELA(Signature & Date)

the Wolfsberg Group

Financial Institution Name:	Banco Bilbao Vizcaya Argentaria, S.A. Shanghai Branch	
Financial institution value.	China	
Location (Country):	Offina	

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer
1. ENTI	TY & OWNERSHIP	
1	Full Legal Name	Banco Bilbao Vizcaya Argentaria, S.A. Shanghai Branch
2	Append a list of foreign branches which are covered by this questionnaire	BBVA Shanghai Branch
3	Full Legal (Registered) Address	4501,08 Jin Mao Tower,88 Century Boulevard, Shanghai 200121, China
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/ establishment	16 Nov,2015
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	Name of primary financial regulator / supervisory authority	China Banking and Insurance Regulatory Commission People's Bank of China

10	Provide Legal Entity Identifier (LEI) if available	
."	Tovide Legal Littly identifier (LET) if available	300300C1321131000022
11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	
	(if different from the Entity completing the DDQ)	
12	Jurisdiction of licensing authority and regulator	
	of ultimate parent	
13	Select the business areas applicable to the	
	Entity	
13 a	Retail Banking	No
13 b	Private Banking / Wealth Management	N
		No
13 c	Commercial Banking	
13 d	Transactional Banking	
10		
13 e	Investment Banking	No
13 f	Financial Markets Trading	
13 g	Securities Services / Custody	No
13 h	Broker / Dealer	
13 i	Multilateral Development Bank	No
13 j	Other	
14	Does the Entity have a significant (10% or more)	
	portfolio of non-resident customers or does it	
	derive more than 10% of its revenue from non- resident customers? (Non-resident means	
	customers primarily resident in a different	
	jurisdiction to the location where bank services are provided.)	
14 a	If Y, provide the top five countries where the non-	
	resident customers are located.	
15	Select the closest value:	
Ľ.	SOURCE CHOOSEST VALUE.	
15 a	Number of employees	1-50
15 b	Total Assets	
.0.5	1001,1000	
16	Confirm that all responses provided in the above	
	Section ENTITY & OWNERSHIP are representative of all the LE's branches	
16 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to.	
16 b	If appropriate, provide any additional information	
.00	/ context to the answers in this section.	

No. of Participant	DUCTS & SERVICES	
17	Does the Entity offer the following products and services:	
17 a	Correspondent Banking	
17 a1	If Y	
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?	
17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?	
17 a4	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?	
17 a6	Does the Entity allow downstream relationships with Foreign Banks?	
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?	
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?	
17 b	Private Banking (domestic & international)	No
17 c	Trade Finance	
17 d	Payable Through Accounts	
17 e	Stored Value Instruments	No
17 f	Cross Border Bulk Cash Delivery	
17 g	Domestic Bulk Cash Delivery	
17 h	International Cash Letter	No
17 i	Remote Deposit Capture	
17 j	Virtual /Digital Currencies	
17 k	Low Price Securities	
17 1	Hold Mail	No
17 m	Cross Border Remittances	
17 n	Service to walk-in customers (non-account holders)	No
17 o	Sponsoring Private ATMs	
17 р	Other high risk products and services identified by the Entity	
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	
8 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
8 b	If appropriate, provide any additional information / context to the answers in this section.	

3. AML	, CTF & SANCTIONS PROGRAMME	
19	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
19 a	Appointed Officer with sufficient experience/expertise	
19 b	Cash Reporting	
19 c	CDD	
19 d	EDD	
19 e	Beneficial Ownership	
19 f	Independent Testing	
19 g	Periodic Review	
19 h	Policies and Procedures	
19 i	Risk Assessment	
19 j	Sanctions	
19 k	PEP Screening	
19 I	Adverse Information Screening	
19 m	Suspicious Activity Reporting	
19 n	Training and Education	
19 o	Transaction Monitoring	
20	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	Less than 10
21	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	
22	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	
23	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	
23 a	If Y, provide further details	
24	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	
24 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
24 b	If appropriate, provide any additional information / context to the answers in this section.	

4. ANT	I BRIBERY & CORRUPTION	
25	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	
26	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	
27	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	
28	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	
29	Is the Entity's ABC programme applicable to:	
30	Does the Entity have a global ABC policy that:	
30 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	
30 b	Includes enhanced requirements regarding interaction with public officials?	
30 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	
32	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	
33	Does the Entity perform an Enterprise Wide ABC risk assessment?	
33 a	If Y select the frequency	
34	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	
35	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
35 a	Potential liability created by intermediaries and other third-party providers as appropriate	
35 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	
35 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	
35 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	
5 e	Changes in business activities that may materially increase the Entity's corruption risk	
16	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	

37	Does the Entity provide mandatory ABC training to:	
37 a	Board and senior Committee Management	
37 b	1st Line of Defence	
37 c	2nd Line of Defence	
37 d	3rd Line of Defence	
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	
37 f	Non-employed workers as appropriate (contractors/consultants)	
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
39 b	If appropriate, provide any additional information / context to the answers in this section.	

A STATE OF THE PARTY OF	CTF & SANCTIONS POLICIES & PROCED	UNES
10	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
40 a	Money laundering	
40 b	Terrorist financing	
40 c	Sanctions violations	
41	Are the Entity's policies and procedures updated at least annually?	
42	Are the Entity's policies and procedures gapped against/compared to:	
42 a	US Standards	
42 a1	If Y, does the Entity retain a record of the results?	
42 b	EU Standards	
42 b1	If Y, does the Entity retain a record of the results?	
43	Does the Entity have policies and procedures that:	
43 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	
43 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	
43 с	Prohibit dealing with other entities that provide banking services to unlicensed banks	
43 d	Prohibit accounts/relationships with shell banks	
43 e	Prohibit dealing with another entity that provides services to shell banks	
43 f	Prohibit opening and keeping of accounts for Section 311 designated entities	
43 g 43 h	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 Assess the risks of relationships with domestic	
43 N	and foreign PEPs, including their family and close associates	
43 i	Define escalation processes for financial crime risk issues	
43 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	
43 k	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	
43 1	Outline the processes regarding screening for sanctions, PEPs and negative media	
43 m	Outline the processes for the maintenance of internal "watchlists"	
44	Has the Entity defined a risk tolerance statement or similar document which defines a risk	
45	Does the Entity have a record retention	
45 a	procedures that comply with applicable laws? If Y, what is the retention period?	
46	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	
46 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
46 b	If appropriate, provide any additional information / context to the answers in this section.	

	CTF & SANCTIONS RISK ASSESSMENT	
47	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
17 a	Client	
17 b	Product	
47 c	Channel	
47 d	Geography	
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	
48 b	Customer Due Diligence	
48 c	PEP Identification	
48 d	Transaction Screening	
48 e	Name Screening against Adverse Media & Negative News	
48 f	Training and Education	
48 g	Governance	
48 h	Management Information	
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	
50 b	Product	
50 c	Channel	
50 d	Geography	

51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
51 a	Customer Due Diligence	
51 b	Transaction Screening	
51 c	Name Screening	
51 d	List Management	
51 e	Training and Education	
51 f	Governance	
51 g	Management Information	
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	
52 a	If N, provide the date when the last Sanctions EWRA was completed.	
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53 b	If appropriate, provide any additional information / context to the answers in this section.	

54	Does the Entity verify the identity of the	
	customer?	
55	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	
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	
56 b	Customer identification	
56 c	Expected activity	
56 d	Nature of business/employment	
56 e	Product usage	
56 f	Purpose and nature of relationship	
56 g	Source of funds	
56 h	Source of wealth	
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	
57 a1	Are ultimate beneficial owners verified?	
57 b	Authorised signatories (where applicable)	
57 c	Key controllers	
57 d	Other relevant parties	
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification ?	
59	Does the due diligence process result in customers receiving a risk classification?	

60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60 a	Product Usage	
60 b	Geography	
60 c	Business Type/Industry	
60 d	Legal Entity type	
60 e	Adverse Information	
60 f	Other (specify)	
61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	
62	If Y, is this at:	
62 a	Onboarding	
62 b	KYC renewal	
62 c	Trigger event	
63	What is the method used by the Entity to screen for adverse media / negative news?	
64	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
65	If Y, is this at:	
65 a	Onboarding	
65 b	KYC renewal	
65 c	Trigger event	
66	What is the method used by the Entity to screen PEPs?	
67	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?	
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	
68 b	Trigger event	
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	

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?	
70 a	Non-account customers	
70 b	Non-resident customers	
70 c	Shell banks	
	Ones parities	
70 d	MVTS/ MSB customers	
70 e	PEPs	·
70 f	PEP Related	
70 g	PEP Close Associate	
70 h	Correspondent Banks	
70 h1	If EDD or EDD & restricted, does the EDD	
	assessment contain the elements as set out in	
	the Wolfsberg Correspondent Banking	
70 i	Principles 2014? Arms, defense, military	
701	Arms, defense, military	
70 j	Atomic power	
70 k	Extractive industries	
70 I	Precious metals and stones	
70 m	Unregulated charities	
70 n	Regulated charities	
70 o	Red light business / Adult entertainment	
70 p	Non-Government Organisations	
70 q	Virtual currencies	
70 r	Marijuana	
	i vanjuana	
70 s	Embassies/Consulates	
70 t	Gambling	
70 u	Payment Service Provider	
70 v	Other (specify)	
	Carter (Green,))	
71	If restricted, provide details of the restriction	
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	
73	Confirm that all responses provided in the above	
. "	Section KYC, CDD and EDD are representative	
<u></u>	of all the LE's branches	
73 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to	
	100	
73 b	If appropriate, provide any additional information / context to the answers in this section.	
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74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious	
75	activity? What is the method used by the Entity to monitor transactions for suspicious activities?	
76	If manual or combination selected, specify what type of transactions are monitored manually	
77	Does the Entity have regulatory requirements to report suspicious transactions?	
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
79 b	If appropriate, provide any additional information / context to the answers in this section.	

80	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	
81	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
81 a	FATF Recommendation 16	
81 b	Local Regulations	
81 b1	Specify the regulation	PRC AML LAW
81 c	If N, explain	
82	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	
83	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	
84	Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?	
85	Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	
85 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
85 b	If appropriate, provide any additional information / context to the answers in this section.	

	NCTIONS	
86	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions?	
87	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)?	
88	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?	
89	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	
90	What is the method used by the Entity?	
91	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	
92	What is the method used by the Entity?	
93	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
93 a	Consolidated United Nations Security Council Sanctions List (UN)	
93 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	
93 c	Office of Financial Sanctions Implementation HMT (OFSI)	
93 d	European Union Consolidated List (EU)	
93 e	Lists maintained by other G7 member countries	
93 f	Other (specify)	
94	Question removed	
95	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:	
95 a	Customer Data	
95 b	Transactions	

	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	

98	Does the Entity provide mandatory training, which includes :	
98 a	Identification and reporting of transactions to government authorities	
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	
98 e	Conduct and Culture	
99	Is the above mandatory training provided to :	
99 a	Board and Senior Committee Management	
99 b	1st Line of Defence	
99 c	2nd Line of Defence	
99 d	3rd Line of Defence	
99 e	3rd parties to which specific FCC activities have been outsourced	
99 f	Non-employed workers (contractors/consultants)	
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	
101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
102 b	If appropriate, provide any additional information / context to the answers in this section.	

103	Are the Entity's KYC processes and documents subject to quality assurance testing?	
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
105 b	If appropriate, provide any additional information / context to the answers in this section.	

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106	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 and Sanctions policies and practices on a regular basis?	
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:	
107 a	Internal Audit Department	
107 b	External Third Party	
108	Does the internal audit function or other independent third party cover the following areas:	
108 a	AML, CTF & Sanctions policy and procedures	
108 b	KYC / CDD / EDD and underlying methodologies	
108 c	Transaction Monitoring	
108 d	Transaction Screening including for sanctions	
108 e	Name Screening & List Management	
108 f	Training & Education	
108 g	Technology	
108 h	Governance	
108 i	Reporting/Metrics & Management Information	
108 j	Suspicious Activity Filing	
108 k	Enterprise Wide Risk Assessment	
108 I	Other (specify)	
109	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	
110	Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches	
110 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110 Ь	If appropriate, provide any additional information / context to the answers in this section.	

Declaration Statement Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2020 (CBDDQ V1.3) Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anil-Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent) BANCO BILBAO VIZCAYA ARGENTARIA S.A 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 egal 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 thisWolfsberg CBDDQ will be kept current and will be updated no less frequently than on an annual basis. The Financial Institution commits to file accurate supplemental information on a timely basis. (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, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and 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. (Signature & Date)