the Wolfsberg Group

Financial Institution Name: Location (Country) : BANCO DO ESTADO DO RIO GRANDE DO SUL, S.A. BRAZIL

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

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	
		Banco do Estado do Rio Grande do Sul S.A.
2	Append a list of foreign branches which are covered by	
	this questionnaire	
		Rep. Office: Cayman Island. All Brazilian branches.
3	Full Legal (Registered) Address	
	The state of the s	
		Rua Capitão Montanha, 177. Porto Alegre - RS. CEP: 90010-040. Brazil.
4	Full Primary Business Address (if different from above)	
4	ruii Filmary Business Address (ii different from above)	
		Rua Caldas Júnior, 108. Porto Alegre - RS. CEP: 90018-900. Brazil.
		The state of the s
	2 15 11	
5	Date of Entity incorporation/establishment	
		September 12 1029
		September 12,1928.
-		
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	
		The Company's shares are traded on B3 S.A Brasil, Bolsa, Balcão, under the ticker symbols BRSR3, BRSR5
		and BRSR6.
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	Yes
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	
		N/A
7	% of the Entity's total shares composed of bearer shares	
	,	
		N/A
8	Does the Entity, or any of its branches, operate under an	
_	Offshore Banking License (OBL)?	Yes
8 a	If Y, provide the name of the relevant branch/es which	
	operate under an OBL	
		Cayman Island
9	Does the Bank have a Virtual Bank License or provide	
	services only through online channels?	yes
10	Name of primary financial regulator/supervisory authority	
		Central Bank of Brazil
11	Provide Legal Entity Identifier (LEI) if available	
	Trovide Legal Entity Identifier (LEI) If available	
		254900W2BN097WLYIM20
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	N/A
		N/A
13	Jurisdiction of licensing authority and regulator of ultimate	
	parent	
		N/A

14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b	Private Banking	No
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	Yes
14 ii	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	No
15 a	If Y, provide the top five countries where the non-resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	5001-10000
16 b	Total Assets	Greater than \$500 million
		Greater than \$500 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	
2 PRODI	JCTS & SERVICES	
	Does the Entity offer the following products and services:	
19	Does the Entity offer the following products and services.	
19 a	Correspondent Banking	No
		NO NO
19 a1	lf Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	
19 a1e	Does the Entity allow downstream relationships with foreign banks?	
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	
19 a1h2	MVTSs	
19 a1h3	PSPs	
13 4 1113	1010	

19 a1i	Does the Entity have processes and procedures in	
	place to identify downstream relationships with MSBs	
	/MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	
		Yes
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No
19 f	International Cash Letter	No
19 g	Low Price Securities	Yes
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then	
	offer third party payment services to their customers?	Yes
19 i1	If V places calcut all that apply helay?	
	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	Yes
19 i3	Virtual Asset Service Providers (VASPs)	No
19 i4	eCommerce Platforms	No
19 i5	Other - Please explain	
19 j	Private Banking	
		No
19 k	Remote Deposit Capture (RDC)	Yes
19 I	Sponsoring Private ATMs	Yes
19 m	Stored Value Instruments	No
19 n	Trade Finance	Yes
19 o	Virtual Assets	No No
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1		A CONTROL OF THE PROPERTY OF T
	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	
19 p5	If you offer other services to walk-in customers please	
. о ро	provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	
2 4841 0	TE & CANCTIONS PROCESSION	
	TF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	Vacantaria de la constanta de
22 b	Adverse Information Screening	Yes
		Yes
22 c	Beneficial Ownership	Yes
22 d	Cash Reporting	Yes
22 e	CDD	Yes
22 f	EDD	Yes
22 f		Yes Yes
22 f 22 g	Independent Testing	Yes
22 f 22 g 22 h	Independent Testing Periodic Review	Yes Yes
22 f 22 g 22 h 22 i	Independent Testing Periodic Review Policies and Procedures	Yes Yes Yes
22 f 22 g 22 h 22 i 22 j	Independent Testing Periodic Review Policies and Procedures PEP Screening	Yes Yes
22 f 22 g 22 h 22 i	Independent Testing Periodic Review Policies and Procedures	Yes Yes Yes Yes Yes
22 f 22 g 22 h 22 i 22 j	Independent Testing Periodic Review Policies and Procedures PEP Screening	Yes Yes Yes

22 m	Cuspinious Activity Papartis	Voc
22 m 22 n		Yes Yes
22 o		Yes
23	How many full time employees are in the Entity's AML,	11-100
24	CTF & Sanctions Compliance Department?	
24	Is the Entity's AML, CTF & Sanctions policy approved at	
	least annually by the Board or equivalent Senior	Yes
	Management Committee? If N, describe your practice in	
25	Question 29. Does the Board receive, assess, and challenge regular	
25		Ven
		Yes
	programme?	
26	Does the Entity use third parties to carry out any	No
	components of its AML, CTF & Sanctions programme?	
26 a	If Y, provide further details	
	D II	V
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	
28 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to	
	the answers in this section.	
4. ANTI B	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and	N
	requirements to reasonably prevent, detect and report	Yes
	bribery and corruption?	
31	Does the Entity have an enterprise wide programme that	
	sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers	
_	with sufficient experience/expertise responsible for	Yes
	coordinating the ABC programme?	
33	Does the Entity have adequate staff with appropriate levels	
	of experience/expertise to implement the ABC	Yes
	programme?	
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This	
	includes promising, offering, giving, solicitation or	
	receiving of anything of value, directly or indirectly, if	Yes
	improperly intended to influence action or obtain an	
	advantage	
35 b	Includes enhanced requirements regarding interaction	
	with public officials?	Yes
35 c	Includes a prohibition against the falsification of books	
	and records (this may be within the ABC policy or any	
	other policy applicable to the Legal Entity)?	Yes
	The point approach to the Logar Line).	
36	Does the Entity have controls in place to monitor the	Yes
	effectiveness of their ABC programme?	10-7-
37	Does the Board receive, assess, and challenge regular	Yes
	reporting on the status of the ABC programme:	
38	Has the Entity's ABC Enterprise Wide Risk Assessment	
		No
38 a	If N, provide the date when the last ABC EWRA was	
50 a	completed.	
	completed.	20/08/2020
39	Does the Entity have an ABC residual risk rating that is the	
	net result of the controls effectiveness and the inherent risk	Yes
	assessment?	
40	Does the Entity's ABC EWRA cover the inherent risk	
	components detailed below:	
40 a	Potential liability created by intermediaries and other third-	Voc
	party providers as appropriate	162
40 b	Corruption risks associated with the countries and	
	industries in which the Entity does business, directly or	No
	through intermediaries	
40 c	Transactions, products or services, including those that	
	involve state-owned or state-controlled entities or public	Yes
	officials	

40 d	Corruption risks associated with gifts and hospitality,	
	hiring/internships, charitable donations and political	Yes
	contributions	1.00
40 e		
40 6	Changes in business activities that may materially	No
	increase the Entity's corruption risk	
41	Does the Entity's internal audit function or other	
	independent third party cover ABC Policies and	Yes
	Procedures?	
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	W
		Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities	
72.0		Yes
42 f	subject to ABC risk have been outsourced	
421	Non-employed workers as appropriate	Not Applicable
	(contractors/consultants)	. Tet / Applicable
43	Does the Entity provide ABC training that is targeted to	Yes
	specific roles, responsibilities and activities?	165
44	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to	
	the answers in this section.	
5. AML.	CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	The state of the s
40		
	consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent, detect	
	and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	
47		Yes
41	Are the Entity's policies and procedures updated at least	Yes
	annually?	1.55
48	Has the Entity chosen to compare its policies and	
	procedures against:	
48 a	U.S. Standards	No
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	N-
		No
48 b1	If Y, does the Entity retain a record of the results?	
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and	
	fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for	
49 D		Yes
40 -	unlicensed banks and/or NBFIs	
49 c	Prohibit dealing with other entities that provide banking	Yes
	services to unlicensed banks	163
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services	
	to shell banks	Yes
49 f		
491	Prohibit opening and keeping of accounts for Section 311	
	designated entities	
49 g	Prohibit opening and keeping of accounts for any of	
	unlicensed/unregulated remittance agents, exchanges	
	houses, casa de cambio, bureaux de change or money	
	transfer agents	
49 h	Assess the risks of relationships with domestic and	
	foreign PEPs, including their family and close associates	l von
	loreign FEFs, including their family and close associates	169

49 i	Define the process for escalating financial crime risk	
	issues/potentially suspicious activity identified by	Yes
40 i	employees	
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Vas
	existing customer relationships due to infancial crime risk	103
49 k	Define the process for exiting clients for financial crime	
	reasons that applies across the entity, including foreign	Yes
	branches and affiliates	
49 1	Define the process and controls to identify and handle	
	customers that were previously exited for financial crime	Yes
	reasons if they seek to re-establish a relationship	
49 m	Outline the processes regarding screening for sanctions,	
	PEPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal	
43 11	"watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar	
	document which defines a risk boundary around their	
	business?	
51	Does the Entity have record retention procedures that	Yes
	comply with applicable laws?	
51 a	If Y, what is the retention period?	
		5 years or more
52	Confirm that all responses provided in the above Section	Yes
52 a	are representative of all the LE's branches If N, clarify which questions the difference/s relate to and	
32 a	the branch/es that this applies to.	
	the branchies that this applies to.	
	M	
53	If appropriate, provide any additional information/context to	
	the answers in this section.	
6. AML, C	TF & SANCTIONS RISK ASSESSMENT	
6. AML, C	Does the Entity's AML & CTF EWRA cover the inherent	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes
54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Yes
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Yes
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls	Yes Yes
54 a 54 b 54 c 54 d 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes Yes
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls	Yes Yes Yes
54 a 54 b 54 c 54 d 55 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the	Yes
54 a 54 a 54 b 54 c 54 d 55 d 55 a 55 5 c 55 d 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA	Yes
54 a 54 a 54 b 54 c 54 d 55 d 55 a 55 5 c 55 d 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
54 a 54 a 54 b 54 c 54 d 55 a 55 a 55 c 55 d 55 e 55 f 55 g 55 h	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA	Yes
54 a 54 b 54 c 54 d 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
54 a 54 a 54 b 54 c 54 d 55 a 55 a 55 c 55 d 55 e 55 f 55 g 55 h	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
54 a 54 b 54 c 54 d 55 5 5 c 55 d 55 c 55 d 55 e 55 f 56 a 56 a 57 57 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
54 a 54 a 54 b 54 c 55 d 55 c 55 d 55 c 55 d 55 f 56 a 57 a 57 b 57 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 56 a 57 a 57 a 57 b 57 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	Yes
54 a 54 a 54 b 54 c 54 d 55 a 55 a 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a 57 a 57 a 57 a 57 a 57 d 58	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
54 a 54 b 54 c 54 d 55 c 55 d 5	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a 57 a 57 a 57 a 57 a 57 d 58	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes

58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the	Yes
59 a	last 12 months?	
39 a	If N, provide the date when the last Sanctions EWRA was completed.	
	was completed.	
60	Confirm that all responses provided in the above Section	Yes
<u> </u>	are representative of all the LE's branches	165
60 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	
61	If appropriate, provide any additional information/context to	
	the answers in this section.	
7. KYC, C	DD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when CDD	
	must be completed, e.g. at the time of onboarding or within	Yes
64	30 days?	
64	Which of the following does the Entity gather and retain	
64 a	when conducting CDD? Select all that apply: Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c 65 d	Key controllers	Yes
66	Other relevant parties What is the Entity's minimum (lowest) threshold applied to	Yes
00	beneficial ownership identification?	Other (Specify the percentage)
67	Does the due diligence process result in customers	
	receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the	
	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3 67 a4	Business Type/Industry Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	Yes
	St. St (Specify)	
68	For high rick non individual quaternary in a city is	
50	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes
68 a	If Y, is this at:	
68 a1	Onboarding	No
68 a2	KYC renewal	No
68 a3	Trigger event	Yes
68 a4	Other	No
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening	
	customers for Adverse Media/Negative News?	Yes
69 a	If Y, is this at:	
69 a1	Onboarding	No
69 a2	KYC renewal	No

69 a3		Yes
70	What is the method used by the Entity to screen for	Combination of automated and manual
	Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening	
/ 1		
	customers and connected parties to determine whether	Yes
	they are PEPs, or controlled by PEPs?	
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
		Yes
71 a3	Trigger event	Tes
72	What is the method used by the Entity to screen PEPs?	Automated
		Automated
73	Does the Entity have policies, procedures and processes	
13		
	to review and escalate potential matches from screening	Yes.
	customers and connected parties to determine whether	Yes
	they are PEPs, or controlled by PEPs?	
74	Is KYC renewed at defined frequencies based on risk	Yes
	rating (Periodic Reviews)?	res
74 a	If yes, select all that apply:	
74 a1	Less than one year	V
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	
74 a4	5 years or more	
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
14 00	Guier (Flease specify)	
7.5	Described Fally and an extended an extended and	
75	Does the Entity maintain and report metrics on current and	
	past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or	
	industries are subject to EDD and/or are restricted, or	
	prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	EDD on risk-based approach
76 b	Respondent Banks	EDD on risk-based approach
		mee at the sacra alphabat.
76 b1	If EDD or restricted, does the EDD assessment contain	N
	the elements as set out in the Wolfsberg	Yes
	Correspondent Banking Principles 2022?	
		EDD on risk-based approach
76 c	Embassies/Consulates	
		EDD on risk-based approach
76 d	Extractive industries	
76 d 76 e	Extractive industries Gambling customers	Prohibited
76 d 76 e 76 f	Extractive industries Gambling customers General Trading Companies	Prohibited EDD on risk-based approach
76 d 76 e 76 f 76 g	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities	Prohibited EDD on risk-based approach Prohibited
76 d 76 e 76 f 76 g 76 h	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach
76 d 76 e 76 f 76 g	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach
76 d 76 e 76 f 76 g 76 h 76 i	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach
76 d 76 e 76 f 76 g 76 h 76 i 76 j	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach
76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach
76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited Prohibited
76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited EDD on risk-based approach
76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited Prohibited
76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 m 76 n	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited EDD on risk-based approach
76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 n 76 n 76 o	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach
76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 i 76 n 76 n 76 o 76 p	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-fovernment Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach
76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 n 76 n 76 n 76 o 76 p 76 q	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-fesident customers Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach
76 d 76 e 76 f 76 g 76 h 76 j 76 k 76 l 76 n 76 o 76 o 76 p 76 q 76 r	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach
76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 n 76 n 76 n 76 o 76 p 76 q	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-fesident customers Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach
76 d 76 e 76 f 76 g 76 h 76 j 76 k 76 l 76 n 76 o 76 o 76 p 76 q 76 r	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach
76 d 76 e 76 f 76 g 76 h 76 i 76 i 76 i 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-foovernment Organisations Non-resident customers Nuclear power Payment Service Providers PEP PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach
76 d 76 e 76 f 76 g 76 h 76 j 76 k 76 j 76 n 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-account customers Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited EDD on risk-based approach
76 d 76 e 76 f 76 g 76 h 76 j 76 k 76 l 76 n 76 o 76 o 76 p 76 c 76 c 76 c 76 c 76 c	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach
76 d 76 e 76 f 76 g 76 h 76 i 76 k 76 l 76 n 76 o 76 p 76 q 76 q 76 r 76 s 76 t 76 u	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited Prohibited Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited
76 d 76 e 76 f 76 g 76 h 76 i 76 i 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 s 76 t 76 w 76 v	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-fovernment Organisations Non-resident customers Nuclear power Payment Service Providers PEP PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach
76 d 76 e 76 f 76 g 76 h 76 i 76 i 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 s 76 t 76 w 76 v	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited Prohibited Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited
76 d 76 e 76 f 76 g 76 h 76 i 76 k 76 l 76 n 76 o 76 p 76 q 76 q 76 r 76 s 76 t 76 u	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-fovernment Organisations Non-resident customers Nuclear power Payment Service Providers PEP PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited Prohibited Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited
76 d 76 e 76 f 76 g 76 h 76 i 76 i 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 s 76 t 76 w 76 v	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-fovernment Organisations Non-resident customers Nuclear power Payment Service Providers PEP PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited Prohibited Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited
76 d 76 e 76 f 76 g 76 h 76 i 76 i 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 s 76 t 76 w 76 v	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-fovernment Organisations Non-resident customers Nuclear power Payment Service Providers PEP PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited Prohibited Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited
76 d 76 e 76 f 76 g 76 h 76 i 76 i 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 s 76 t 76 w 76 v	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-fovernment Organisations Non-resident customers Nuclear power Payment Service Providers PEP PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited Prohibited Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited
76 d 76 e 76 f 76 g 76 h 76 i 76 k 76 l 76 n 76 o 76 p 76 c	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-dovernment Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited Prohibited Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited
76 d 76 e 76 f 76 g 76 h 76 i 76 i 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 s 76 t 76 w 76 v	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-fovernment Organisations Non-resident customers Nuclear power Payment Service Providers PEP PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited Prohibited Prohibited Prohibited
76 d 76 e 76 f 76 g 76 h 76 i 76 k 76 l 76 n 76 o 76 p 76 c	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-dovernment Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited Prohibited Prohibited Prohibited
76 d 76 e 76 f 76 g 76 h 76 i 76 k 76 l 76 n 76 o 76 p 76 c	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-dovernment Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Prohibited EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited Prohibited Prohibited Prohibited Prohibited
76 d 76 e 76 f 76 g 76 h 76 i 76 k 76 l 76 n 76 o 76 p 76 c	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-dovernment Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited Prohibited Prohibited
76 d 76 e 76 f 76 g 76 h 76 j 76 k 76 l 76 n 76 o 76 p 76 c 76 c 76 c 76 c 76 c 76 c 77 c 77 c	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated Charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited Prohibited Prohibited
76 d 76 e 76 f 76 g 76 h 76 i 76 k 76 l 76 n 76 o 76 p 76 c	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-dovernment Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify) If restricted, provide details of the restriction Does EDD require senior business management and/or	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited
76 d 76 e 76 f 76 g 76 h 76 i 76 i 76 k 76 l 76 n 76 o 76 p 76 c 76 r 76 s 76 t 76 v 76 v 76 v 76 v 76 v 77	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated Charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited Prohibited

78 a	If Y indicate who provides the approval:	Senior business management
79	Does the Entity have specific procedures for onboarding	Oction business management
	entities that handle client money such as lawyers,	No
	accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or quality	Yes
81	review on clients subject to EDD?	165
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to	
	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
82	If appropriate, provide any additional information/context to	
	the answers in this section.	
		Regarding item 66: for individuals 10% and for companies 20%; Regarding item 78a:Senior business management of the branches.
		or the branches.
9 MONIT	TORING & REPORTING	
83		
0.5	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of	Vec
	suspicious activity?	Yes
84	What is the method used by the Entity to monitor	Address
	transactions for suspicious activities?	Automated
84 a	If manual or combination selected, specify what type of	
	transactions are monitored manually	
84 b	If automated or combination selected, are internal	Vendor-sourced tools
84 b1	system or vendor-sourced tools used? If 'Vendor-sourced tool' or 'Both' selected, what is the	10/10/10/10/10/10/10/10/10/10/10/10/10/1
04 01	name of the vendor/tool?	
	Tame of the verteen tool.	Our vendor's name is Softon Sistemas Inteligentes.
84 b2	When was the tool last updated?	. tunas
84 b3	When was the automated Transaction Monitoring	< 1 year
0100	application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report	
	suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and	
	processes to comply with suspicious transaction	Yes
86	reporting requirements? Does the Entity have policies, procedures and processes	
00	to review and escalate matters arising from the monitoring	Yes
	of customer transactions and activity?	165
87	Does the Entity have a data quality management	
	programme to ensure that complete data for all	Yes
	transactions are subject to monitoring?	
88	Does the Entity have processes in place to respond to	
	Request For Information (RFIs) from other entities in a timely manner?	No
89	Does the Entity have processes in place to send Requests	
	for Information (RFIs) to their customers in a timely	No
	manner?	
90	Confirm that all responses provided in the above Section	Yes
00 -	are representative of all the LE's branches	165
90 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to	
04	И	
91	If appropriate, provide any additional information/context to	
	the answers in this section.	Regarding itens 88 and 89: we are not aware of this tool being available in Brazil.
		- 195 and 50 and 50. We are not aware of this tool being available in Brazil.
0 Days		
92 PAYM	ENT TRANSPARENCY	
32	Does the Entity adhere to the Wolfsberg Group Payment	Yes
	Transparency Standards?	

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	Law 9,613/98; Law 13,260/16; Law 13,810/19; CMN Resolution 3,568/08; CMN Resolution 4,557/17; CMN Resolution 4,935/21; CMN Resolution 4,968/21; Law 14,286/22; BCB Resolution 277/22; BCB Resolution 44/20; BCB Circular Letter 4,001/21; CVM Resolution 50/20; SUSEP Circular Letter 612/20
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC		
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions	Yes
102	Lists? What is the method used by the Entity for sanctions screening?	Both Automated and Manual
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Accuity/Lexis Nexis
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Combination of automated and manual
105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d 106 e	European Union Consolidated List (EU) Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data Not used

106 b	United States Department of the Treasury's Office of	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Foreign Assets Control (OFAC)	osco for screening customers and beneficial owners and for intering transactional data
106 C	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	
106 d	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	Not used
1001	Offier (specify)	
107	When regulatory authorities make updates to their	
	Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	
11. TRAIN	IING & EDUCATION	
111	Does the Entity provide mandatory training, which	
	includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	No
112	Is the above mandatory training provided to :	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	Tot Ellio of Belefice	
	2nd Line of Defence	Yes
112 d	2nd Line of Defence 3rd Line of Defence	
112 d 112 e	2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced	Yes
112 d	2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been	Yes Yes Not Applicable
112 d 112 e	2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced	Yes Yes
112 d 112 e	2nd Line of Defence 3rd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities? Does the Entity provide customised training for AML, CTF	Yes Yes Not Applicable Not Applicable
112 d 112 e 112 f 113	2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes Yes Not Applicable Not Applicable Yes Yes
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preventing a detecting trade?	120		Yes
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129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	

Declaration Statement

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

BANCO DO ESTADO DO RIO GRANDE DO SUL, 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 applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

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

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

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

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

Verno Kirst

I. ______(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.

André Silveira

(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

December 2023

(Signature & Date)

Verno Luiz Kirst-4474 Superintendente Executivo

December 2023

(Signature & Date)

André Josafa da Silva Silveira-5690 Superintendente Executivo