the Wolfsberg Group

Financial Institution Name: Location (Country): IPConcept (Luxemburg) S.A. Luxembourg

No #	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal name	IPConcept (Luxemburg) S.A.
		iii oonoopi (Euxonibuig) osti
2	Append a list of foreign branches which are covered	,
	by this questionnaire (if applicable)	n/a
3	Full Legal (Registered) Address	
ľ	Tuli Legal (Registered) Address	4, rue Thomas Edison L-1445 Strassen, Luxembouorg
		L-1440 Ottasseri, Euxembouorg
4	Full Primary Business Address (if different from above)	
	above)	
5	Date of Entity incorporation/establishment	23/05/2001
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	
	Symbol	
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d 6 d1	Privately Owned If Y, provide details of shareholders or ultimate	Yes
o u i	beneficial owners with a holding of 10% or more	joint-stock company IPConcept is a 100% subsidiary of DZ PRIVATBANK S.A.
	(((((((((((((((((((
7	% of the Entity's total shares composed of bearer shares	0 %
8	Does the Entity, or any of its branches, operate under	No
8 a	an Offshore Banking License (OBL) ? If Y, provide the name of the relevant branch/es	
	which operate under an OBL	
9	December Death have a Visual Decision	
3	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Provide Legal Entity Identifier (LEI) if available	529900X2YIFA3JTG4580
2. AML, C	TF & SANCTIONS PROGRAMME	
11	Does the Entity have a programme that sets	
	minimum AML, CTF and Sanctions standards regarding the following components:	
ļ.,	0 0 1	
11 a	Appointed Officer with sufficient experience/expertise	Yes
11 b	Adverse Information Screening	Yes
11 c	Beneficial Ownership	Yes
11 d	Cash Reporting	Not Applicable
11 e 11 f	CDD EDD	Yes Yes
	בטט	100

11 g Independent Testing Yes 11 h Periodic Review Yes 11 i Policies and Procedures Yes 11 j PEP Screening Yes 11 k Risk Assessment Yes 11 I Sanctions Yes 11 m Suspicious Activity Reporting Yes 11 n Training and Education Yes 11 o Transaction Monitoring Yes 12 Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? Yes 13 Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? Yes 13 a If Y, provide further details IPConcept use a third party as register and transfer management and marketing intermediaries. 14 Does the entity have a whistleblower policy? Yes 3. ANTI BRIBERY & CORRUPTION 15 Has the Entity documented policies and procedures	r agent, portfolio
11 i Policies and Procedures Yes 11 j PEP Screening Yes 11 k Risk Assessment Yes 11 l Sanctions Yes 11 m Suspicious Activity Reporting Yes 11 n Training and Education Yes 11 o Transaction Monitoring Yes 12 ls the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? 13 Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? 13 a If Y, provide further details IPConcept use a third party as register and transfer management and marketing intermediaries. 14 Does the entity have a whistleblower policy? Yes 3. ANTI BRIBERY & CORRUPTION	r agent, portfolio
11 j PEP Screening Yes 11 k Risk Assessment Yes 11 I Sanctions Yes 11 m Suspicious Activity Reporting Yes 11 n Training and Education Yes 11 o Transaction Monitoring Yes 12 Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? 13 Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? 13 If Y, provide further details 14 Does the entity have a whistleblower policy? Yes 15 Yes 16 Yes 17 Yes 18 IPConcept use a third party as register and transfer management and marketing intermediaries.	r agent, portfolio
11 k Risk Assessment Yes 11 I Sanctions Yes 11 m Suspicious Activity Reporting Yes 11 n Training and Education Yes 11 o Transaction Monitoring Yes 12 Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? 13 Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? 13 If Y, provide further details IPConcept use a third party as register and transfer management and marketing intermediaries. 14 Does the entity have a whistleblower policy? Yes 3. ANTI BRIBERY & CORRUPTION	r agent, portfolio
11 I Sanctions Yes 11 m Suspicious Activity Reporting Yes 11 n Training and Education Yes 11 o Transaction Monitoring Yes 12 Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? Yes 13 Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? Yes 13 a If Y, provide further details IPConcept use a third party as register and transfer management and marketing intermediaries. 14 Does the entity have a whistleblower policy? Yes 3. ANTI BRIBERY & CORRUPTION	r agent, portfolio
11 m Suspicious Activity Reporting Yes 11 n Training and Education Yes 11 o Transaction Monitoring Yes 12 Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? 13 Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? 13 a If Y, provide further details 16 If Y, provide further details 17 Does the entity have a whistleblower policy? 18 Yes 19 PConcept use a third party as register and transfer management and marketing intermediaries.	r agent, portfolio
11 n Training and Education Yes 11 o Transaction Monitoring Yes 12 Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? 13 Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? 13 a If Y, provide further details 16 If Y, provide further details 17 If Y Does the entity have a whistleblower policy? 18 Yes 19 IPConcept use a third party as register and transfer management and marketing intermediaries. 19 IPConcept use a third party as register and transfer management and marketing intermediaries.	r agent, portfolio
11 o Transaction Monitoring Yes 12 Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? 13 Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? 13 If Y, provide further details 16 If Y, provide further details 17 If Y, provide further details 18 IPConcept use a third party as register and transfer management and marketing intermediaries. 19 If Y, provide further details 19 IPConcept use a third party as register and transfer management and marketing intermediaries.	r agent, portfolio
12 Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? 13 Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? 13 If Y, provide further details 14 Does the entity have a whistleblower policy? 15 Yes 16 Yes 17 Yes 18 IPConcept use a third party as register and transfer management and marketing intermediaries.	r agent, portfolio
at least annually by the Board or equivalent Senior Management Committee? 13 Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? 13 If Y, provide further details 14 Does the entity have a whistleblower policy? 15 Yes 16 Yes 17 Yes 18 AMTI BRIBERY & CORRUPTION	r agent, portfolio
components of its AML, CTF & Sanctions programme? 13 a	r agent, portfolio
IPConcept use a third party as register and transfer management and marketing intermediaries. 14 Does the entity have a whistleblower policy? 3. ANTI BRIBERY & CORRUPTION	r agent, portfolio
3. ANTI BRIBERY & CORRUPTION	
3. ANTI BRIBERY & CORRUPTION	
mas the Entity documented policies and procedures	
consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	
Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures? Yes	
17 Does the Entity provide mandatory ABC training to:	
17 a Board and Senior Committee Management Yes	
17 b 1st Line of Defence Yes	
17 c 2nd Line of Defence Yes	
17 d 3rd Line of Defence Yes	
17 e Third parties to which specific compliance activities subject to ABC risk have been outsourced No	
17 f Non-employed workers as appropriate (contractors/consultants)	
4. AML, CTF & SANCTIONS POLICIES & PROCEDURES	
Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
18 a Money laundering Yes	
18 b Terrorist financing Yes	
18 c Sanctions violations Yes	
19 Does the Entity have policies and procedures that:	
19 a Prohibit the opening and keeping of anonymous and fictitious named accounts	
19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	
19 c Prohibit dealing with other entities that provide banking services to unlicensed banks	
19 d Prohibit accounts/relationships with shell banks Yes	
19 e Prohibit dealing with another Entity that provides services to shell banks	
19 f Prohibit opening and keeping of accounts for Section 311 designated entities Yes	
Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de	
change or money transfer agents	
19 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates Yes	
Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees Yes	
Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative Yes	

20	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
21	Does the Entity have record retention procedures that comply with applicable laws?	Yes
21 a	If Y, what is the retention period?	
		5 years or more
5. KYC, C	DD and EDD	
22	Does the Entity verify the identity of the customer?	Yes
23	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes
24	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
24 a	Customer identification	Yes
24 b	Expected activity	Yes
24 c	Nature of business/employment	Yes
24 d	Ownership structure	Yes
24 e 24 f	Product usage	Yes
	Purpose and nature of relationship	Yes
24 g 24 h	Source of funds Source of wealth	Yes Yes
25	Are each of the following identified:	100
25 a	Ultimate beneficial ownership	Yes
25 a1	Are ultimate beneficial owners verified?	Yes
25 b	Authorised signatories (where applicable)	Yes
25 с	Key controllers	Yes
25 d	Other relevant parties	Yes
26	Does the due diligence process result in customers receiving a risk classification?	Yes
27	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
28	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
29	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
29 a	If yes, select all that apply:	
29 a1	Less than one year	No
29 a2	1 – 2 years	Yes
29 a3	3 – 4 years	Yes
29 a4	5 years or more	No
29 a5 29 a6	Trigger-based or perpetual monitoring reviews Other (please specify)	Yes
30	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
30 a	Arms, Defence, Military	EDD on risk-based approach
30 b	Correspondent Banks	EDD on risk-based approach
30 b1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
30 c	Embassies/Consulates	EDD on risk-based approach
30 d	Extractive industries	EDD on risk-based approach
30 e	Gambling customers	EDD on risk-based approach
30 f	General Trading Companies	EDD on risk-based approach
30 g	Marijuana-related Entities	Prohibited
30 h	MSB/MVTS customers	Do not have this category of customer or industry
30 i	Non-account customers	EDD on risk-based approach
30 j	Non-Government Organisations	EDD on risk-based approach
30 k	Non-resident customers	EDD on risk-based approach
	1	i''

Payment Service Provider Do no PEPS Do no PEPS EDD on risk-based approach Prohibited Prohibited Prohibited The restricted provide details of the restriction The restricted provide details of the restriction and reporting of suspicious activities? The restricted provide details of the restriction and reporting of suspicious activities? The restricted provide details of the restriction provide provide provide provide provide provide pro			
PEPS Citize Associates EDD on risk-based approach	30 I	Nuclear power	EDD on risk-based approach
PEP Clase Associations	30 m	Payment Service Provider	EDD on risk-based approach
PEP Clace Associations EDO on risk-based approach	30 n	•	EDD on risk-based approach
90 P FPE Related 90 Q Precious mentals and stones 90 P Red light businesses/Actul intentaliment 90 P P Red light businesses/Actul intentaliment 90 P P P P P P P P P P P P P P P P P P P	30 o	PEP Close Associates	EDD on risk-based approach
Precious metals and stores	30 p		
Regulated charities	30 a		**
10 s Regulated charities			**
19 1 Shell banks Prohibited Prohibited Do not have this category of customer or industry 10 to V Unregulated charities EDO on the based approach 10 to V Unregulated charities EDO on the based approach 10 to V Unregulated Carlosearch 20 to V Unregulated 20 to V Unregulated Carlosearch 20 to V Unregulated 20 to V Unregulated 20 to V Unregulated 20 to V Unregulated 20 to V Unregulat		-	**
19 U Travel and Tour Companies Do not have this category of customer or industry 10 V Unregulated forinties EDO on risk-based approximation of the Companies Do not have this category of customer or industry 10 V Unregulated forinties Do not have this category of customer or industry 10 V Unregulated Car Dealers Do not have this category of customer or industry 10 V Unregulated Car Dealers Do not have this category of customer or industry 10 V Other (specify) 11 If restricted, provide details of the restriction 12 Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activities? 13 What is the method used by the Entity to monitor transactions for suspicious activities? 13 If manual or combination selected, specify what type of transactions are monitored manually per of transactions are monitored manually per of transactions are monitored manually per of transactions are proprieted to report applications and processes to treive with escapelations transactions and activity? 14 Does the Entity have regulate ory requirements to report applications are monitored manually processes to review and escalate matters arising from the monitoring of customer transactions and activity? 15 Does the Entity have transactions and activity? 16 Does the Entity activity and the experimental processes to review and escalate matters arising from the monitoring of customer transactions and activity? 17 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 18 Does the Entity have policies, procedures and processes to research processes and p		9	**
Unregulated charities Do not have this category of customer or industry Do not have this category of customer or industry Other (specify)		Shell banks	Prohibited
Superior		Travel and Tour Companies	Do not have this category of customer or industry
Virtual Asset Service Providers	30 v	Unregulated charities	EDD on risk-based approach
Other (specify) Other (specify) If restricted, provide details of the restriction B. MONITORING & REPORTING Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activities? What is the method used by the Entity to monitor transactions for suspicious activities? Automated Automate	30 w	Used Car Dealers	Do not have this category of customer or industry
If restricted, provide details of the restriction If restricted, provide details of the restriction If restricted, provide details of the restriction If yes and monitoring processes for the identification and reporting of suspicious activity? What is the method used by the Entity to monitor transactions for suspicious activities? If manual or combination selected, specify what type of transactions for suspicious transactions? If manual or combination selected, specify what type of transactions are monitored manually Automated The property of transactions are monitored manually If yes the Entity have regulat ory requirements to report suspicious transactions? If yes the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements? Does the Entity have policies, procedures and processes to review and escalatio maties arising from the monitoring of customer transactions and activity? Payment Transparency Standards? Does the Entity have policies, procedures and processes to review yes Usandards? Payment Transparency Standards? Does the Entity have policies, procedures and processes to resonably comply with and have controls in place to ensure compliance with: Yes The Local Regulations If Y, Specify the regulation Regulation (EU) 847/2015, Common Reporting Standard, Fatca, AML-Law reports and processes to reasonably comply with respect to its business conducted with, or through accounts held at foreign financial institutions? 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? 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	30 x	Virtual Asset Service Providers	Do not have this category of customer or industry
Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity? What is the method used by the Entity to monitor transactions for suspicious activities? Does the Entity have regulated to y requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions and processes to comply with suspicious transactions reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? PAYMENT TRANSPARENCY Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? PAYMENT TRANSPARENCY Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? PAYMENT TRANSPARENCY T. PAYMENT TRANSPARENCY To Does the Entity have policies, procedures and processes to reasonably comply with and have controls in place to ensure compliance with: To a FATE Recommendation 16 To Local Regulations If Y, Specify the regulation Processes to resonably comply with and have controls in place to ensure compliance with: Regulation (EU) 847/2015, Common Reporting Standard, Fatca, AML-Law Regulation (EU) subsiness conducted with, or through accounts held at foreign financial institutions? Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions taw applicable to the fettity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sonctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in	30 y	Other (specify)	
Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity? What is the method used by the Entity to monitor transactions for suspicious activities? If manual or combination selected, specify what type of transactions are monitored manually The manual or combination selected, specify what type of transactions are monitored manually Does the Entity have regulat ory requirements to report suspicious transactions? If y, does the Entity have policies, procedures and processes to renophy with suspicious transactions reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? PAYMENT TRANSPARENCY Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have policies, procedures and processes to reasonably comply with and have controls in place to ensure compliance with: 17 A FATF Recommendation 16 Yes The Local Regulation If Y, Specify the regulation Regulation (EU) 847/2015, Common Reporting Standard, Fatca, AML-Law Regulation for the processes or reasonably designed with sanctions law applicable to the Entity, Including with respect to its business conducted with, or through accounts held at foreign financial institutions, and/or detect actions taken to evade applicables and/or masking, of sanctions reflexing or or other controls reasonably designed to prohibit and/or detect actions taken to evade applicables and orm asking, of sanctions reflexing including on the resolutions and/or masking, of sanctions reflexing including on the resolutions and/or masking, of sanctions reflexing including in the resolutions and/or masking, of sanctions reflexing including in the specific or sacking, of sanctions reflexing information in	31	If restricted, provide details of the restriction	
Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity? What is the method used by the Entity to monitor transactions for suspicious activities? If manual or combination selected, specify what type of transactions are monitored manually The manual or combination selected, specify what type of transactions are monitored manually Does the Entity have regulat ory requirements to report suspicious transactions? If y, does the Entity have policies, procedures and processes to renophy with suspicious transactions reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? PAYMENT TRANSPARENCY Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Does the Entity have policies, procedures and processes to reasonably comply with and have controls in place to ensure compliance with: 17 A FATF Recommendation 16 Yes The Local Regulation If Y, Specify the regulation Regulation (EU) 847/2015, Common Reporting Standard, Fatca, AML-Law Regulation for the processes or reasonably designed with sanctions law applicable to the Entity, Including with respect to its business conducted with, or through accounts held at foreign financial institutions, and/or detect actions taken to evade applicables and/or masking, of sanctions reflexing or or other controls reasonably designed to prohibit and/or detect actions taken to evade applicables and orm asking, of sanctions reflexing including on the resolutions and/or masking, of sanctions reflexing including on the resolutions and/or masking, of sanctions reflexing including in the resolutions and/or masking, of sanctions reflexing including in the specific or sacking, of sanctions reflexing information in	o Monuto		
and monitoring processes for the identification and reporting of suspicious activity? 33 What is the method used by the Entity to monitor transactions for suspicious activities? 34 Does the Entity have regulat ory requirements to report suspicious transactions are monitored manually 35 Does the Entity have regulat ory requirements to report suspicious transactions? 36 If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements? 36 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 37 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 38 Does the Entity have policies, procedures and processes to reasonably comply with and have controls in place to ensure compliance with: 37 Does the Entity have policies, procedures and processes to reasonably comply with and have controls in place to ensure compliance with: 38 If Y, Specify the regulation 39 If Y, Specify the regulation 30 Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions lav applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions; held at foreign financial institutio		JKING & REPORTING	
Iransactions for suspicious activities? If manual or combination selected, specify what type of transactions are monitored manually Does the Entity have regulat ory requirements to report suspicious transactions? If y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? PAYMENT TRANSPARENCY Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Does the Entity have policies, procedures and processes to resonably comply with and have controls in place to ensure compliance with: If Y, Specify the regulation FATF Recommendation 16 Ves Total Regulations Ves Regulation (EU) 847/2015, Common Reporting Standard, Fatca, AMIL-Law Posses 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? 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 resultoniss and/or masking, of sanctions replicable sanctions prohibitions, such as stripping, or the resultoniss and/or masking, of sanctions replicable sanctions prohibitions, such as stripping, or the resultoniss and or masking, of sanctions replicable sanctions prohibitions, such as stripping, or the resultonission and/or masking, of sanctions relevant information in	32	and monitoring processes for the identification and	Yes
type of transactions are monitored manually Does the Entity have regulat ory requirements to report suspicious transactions? Yes 14 a	33		Automated
report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 36 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? 7. 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: 37 a FATR Recommendation 16 FATR Recommendation 16 For the regulations For the regulation Fatca, AML-Law Regulation (EU) 847/2015, Common Reporting Standard, Fatca, AML-Law Regulation (EU) 847/2015, Common Reporting Standard, Fatca, AML-Law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? 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	33 a		
processes to comply with suspicious transactions reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 36 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? 7. Does the Entity have policies, procedures and processes to reasonably comply with and have controls in place to ensure compliance with: 37 a FATF Recommendation 16 For Payment Transparency Standards? For Payment Transparency Standards? For Payment Transparency Standards? Pes 37 b Local Regulations Yes 38 If Y, Specify the regulation Regulation (EU) 847/2015, Common Reporting Standard, Fatca, AML-Law Regulation (EU) 847/2015, Common Reporting Standard, Fatca, AML-Law B. SANCTIONS 8. SANCTIONS 8. SANCTIONS 39 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? 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	34		Yes
processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 36 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? 37 Does the Entity have policies, procedures and processes to reasonably comply with and have controls in place to ensure compliance with: 37 a FATF Recommendation 16 Yes 37 b Local Regulations Yes 37 b Local Regulation Regulation Regulation Regulation Regulation (EU) 847/2015, Common Reporting Standard, Fatca, AML-Law 38 Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? 39 Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions and/or masking, of sanctions relevant information in	34 a	processes to comply with suspicious transactions	Yes
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: Table 1 FATF Recommendation 16 Yes FATF Recommendation 16 Yes If Y, Specify the regulation If Y, Specify the regulation Regulation (EU) 847/2015, Common Reporting Standard, Fatca, AML-Law Regulation (EU) 847/2015, Common Reporting Standard, Fatca, AML-Law B. SANCTIONS SANCTIONS 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? 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	35	processes to review and escalate matters arising from the monitoring of customer transactions and	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: FATF Recommendation 16 Local Regulations If Y, Specify the regulation Regulation (EU) 847/2015, Common Reporting Standard, Fatca, AML-Law FIN, explain 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? 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	7. PAYME	NT TRANSPARENCY	
processes to reasonably comply with and have controls in place to ensure compliance with: 37 a FATF Recommendation 16 Yes 37 b Local Regulations Yes 37 b If Y, Specify the regulation Regulation (EU) 847/2015, Common Reporting Standard, Fatca, AML-Law 38 B 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? 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	36	,	Yes
Sanctions Sanc	37	processes to reasonably comply with and have	
Sanctions Sanc	37 a	FATF Recommendation 16	Yes
If Y, Specify the regulation Regulation (EU) 847/2015, Common Reporting Standard, Fatca, AML-Law Pes Pes Pes Pes Pes Pes Pes Pe	37 b		
B. SANCTIONS 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? 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	37 b1		
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? 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	37 c	If N, explain	
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? 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	8. SANCTI	ONS	
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	38	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts	Yes
	39	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	Yes

40		
40	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
41	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
41 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners (i.e. reference data)
41 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners (i.e. reference data)
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners (i.e. reference data)
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners (i.e. reference data)
41 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners (i.e. reference data)
41 f	Other (specify)	
42	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
9. TRAII	NING & EDUCATION	
43	Does the Entity provide mandatory training, which includes:	
43 a	Identification and reporting of transactions to government authorities	Yes
43 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
43 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
43 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
44	Is the above mandatory training provided to :	
44 a	Board and Senior Committee Management	Yes
44 b	1st Line of Defence	Yes
44 c	2nd Line of Defence	Yes
44 d	3rd Line of Defence	Yes
44 e	Third parties to which specific FCC activities have been outsourced	No
44 f	Non-employed workers (contractors/consultants)	No
10. AUD	lT	
45	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
	•	