the Wolfsberg Group

Financial Institution Name: Location (Country): JOINT STOCK COMPANY "PIRAEUS BANK ICB" UKRAINE

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

No#	Question	Answer
. ENTITY	& OWNERSHIP	
1	Full Legal Name	JOINT STOCK COMPANY "PIRAEUS BANK ICB"
		JOINT STOCK COMPANY FINAEOS BANKTOD
	A	
2	Append a list of foreign branches which are covered	The Bank has no foreign branches
	by this questionnaire	
3	Full Legal (Registered) Address	11, Biloruska St., Kylv, 04119, Ukraine
		11, billionadia ou, ryris our ros allamo
4	Full Primary Business Address (if different from	
4	above)	
	above	
5	Date of Entity incorporation/establishment	31.01.1994
6	Select type of ownership and append an ownership	
	chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a 1	If Y, indicate the exchange traded on and ticker	
vai	symbol	
	dynnor	
	The state of the s	No
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate	Piraeus Financial Holdings S.A. (Legal address: 4 Amerikis Street, 105 64,
	beneficial owners with a holding of 10% or more	Athens, Greece) - 99.991818%
		Transition of the control of the con
7	% of the Entity's total shares composed of bearer	
	shares	N/A
	Does the Entity, or any of its branches, operate under	
8	an Offshore Banking License (OBL)?	No
	If Y, provide the name of the relevant branch/es	
8 a		
_ _		
	which operate under an OBL	
_	which operate under an OBL	
9	which operate under an OBL Does the Bank have a Virtual Bank License or	No.
	which operate under an OBL Does the Bank have a Virtual Bank License or provide services only through online channels?	No
9	which operate under an OBL Does the Bank have a Virtual Bank License or provide services only through online channels?	
	which operate under an OBL Does the Bank have a Virtual Bank License or provide services only through online channels? Name of primary financial regulator/supervisory	No The National Bank of Ukraine
9	which operate under an OBL Does the Bank have a Virtual Bank License or provide services only through online channels?	
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9 10 11	which operate under an OBL Does the Bank have a Virtual Bank License or provide services only through online channels? Name of primary financial regulator/supervisory authority	The National Bank of Ukraine 254900S20CVZ33LOX002
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9 10 11	which operate under an OBL Does the Bank have a Virtual Bank License or provide services only through online channels? Name of primary financial regulator/supervisory authority Provide Legal Entity Identifier (LEI) if available Provide the full legal name of the ultimate parent (if	The National Bank of Ukraine 254900S20CVZ33LOX002
9 10 11	which operate under an OBL Does the Bank have a Virtual Bank License or provide services only through online channels? Name of primary financial regulator/supervisory authority Provide Legal Entity Identifier (LEI) if available Provide the full legal name of the ultimate parent (if	The National Bank of Ukraine 254900S20CVZ33LOX002

13		
4	Jurisdiction of licensing authority and regulator of ultimate parent	Greece
	aronno parant	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	
14 b	Private Banking	Yes
14 c	Commercial Banking	No
14 d	Transactional Banking	Yes
14 o	Investment Banking	No
14 f	Financial Markets Trading	No
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	Yes
14 i	Multilateral Development Bank	Yes
14 j	Wealth Management	No .
14 k	Other (please explain)	No
	Color (piccise 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 (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	, No
15 a	If Y, provide the top five countries where the non- resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	201-500
16 b	Total Assets	Between \$100 and \$500 million
17	Confirm that all responses provided in the above	Detween \$100 and \$500 million
	Section are representative of all the LE's branches.	No
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	The Bank has no foreign branches
18	If appropriate, provide any additional information/context to the answers in this section.	
PRODU	CTS & SERVICES	
19	Does the Entity offer the following products and	
	services:	
19 a	Correspondent Banking	
19 a1	If Y	No
19 a1a	Does the Entity offer Correspondent Banking	
	services to domestic banks?	Please select
19 a1b	1 Does the Entity allow domestic bank clients to	
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures	Please select
9 a1c	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Please select Please select
9 a1c	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks?	
9 a1d	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks?	Please select
9 a1c	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Please select
9 a1d	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with	Please select Please select Please select
9 a1c 9 a1d 9 a1e 9 a1f	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	Please select Please select Please select Please select
9 a1c 9 a1d 9 a1e 9 a1f 9 a1g	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	Please select Please select Please select Please select Please select
9 a1c 9 a1d 9 a1e 9 a1f 9 a1g	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	Please select Please select Please select Please select

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	Please select
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	No
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?	No
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	Please select
19 i3	Virtual Asset Service Providers (VASPs)	Please select
19 14	eCommerce Platforms	Please select
19 i5	Other - Please explain	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No
19 l	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 n	Trade Finance	Yes
19 o	Virtual Assets	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	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	Please select
19 p2	Wire transfers	Yes
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	Please select
19 p4	Sale of Monetary Instruments	No -
19 p4a	If yes, state the applicable level of due diligence	Please select
19 p5	If you offer other services to walk-in customers please 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.	No
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	The Bank has no foreign branches
21	If appropriate, provide any additional information/context to the answers in this section.	
3 AMI CT	F & 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	Yes
22 b	Adverse Information Screening	Yes
22 c	Beneficial Ownership	Yes
22 d	Cash Reporting	Yes
22 e	CDD	Yes
22 f	EDD	Yes
22 g	Independent Testing	Yes
22 h	Periodic Review	Yes
22 i	Policies and Procedures	Yes
22 j	PEP Screening	Yes
22 k	Risk Assessment	Yes
221	Sanctions	Yes
		1 1 2 2

22 m	Suspicious Activity Reporting	
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	11-100
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Yes
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme:	No
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	The Bank has no foreign branches
29	If appropriate, provide any additional information/context to the answers in this section.	
4. ANTI	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
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 coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
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:	The state of the s
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 improperly intended to influence action or obtain an advantage.	Yes
15 b	Includes enhanced requirements regarding interaction with public officials?	Yes
15 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
16	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
7	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
8	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
8 a	If N, provide the date when the last ABC EWRA was completed.	
9	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
0	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
0 a	Potential liability created by intermediaries and	Yes

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	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 subject to ABC risk have been outsourced	No
42 f	Non-employed workers as appropriate (contractors/consultants)	No
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	The Bank has no foreign branches
45	If appropriate, provide any additional information/context to the answers in this section.	
5 AML C	TF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	No
48 a1	If Y, does the Entity retain a record of the results?	No
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	Yes
49 49 a	Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous	Yes
49 b	and fictitious named accounts Prohibit the opening and keeping of accounts for	Yes
49 c	unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide	Yes
49 d	banking services to unlicensed banks Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close	

Define the process for escalating financial crime risk issues/potentials ye supclious activity dentified by employees 49 Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk applies across the entity, including foreign branches and affiliates 49 Define the process for existing dients for financial crime reasons that applies across the entity, including foreign branches and affiliates 49 Define the process and controls to Identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship 49 Define the processes regarding screening for senctions, PEPs and Adverse MedialNegative News 49 Duffine the processes regarding screening for senctions, PEPs and Adverse MedialNegative News 50 Alias the Entity defined a risk tolerance statement or similar document which defines a risk boundary strough that publicable laws? 51 Does the Entity have record relation procedures that comply with applicable laws? 52 Confirm that all responses provided in the above Section are representative of all the LE's branches 52 Confirm that all responses provided in the above Section are representative of all the LE's branches 52 Confirm that all responses provided in the above Section are representative of all the LE's branches 53 If appropriate, provide any additional information/context to the answers in this section. 54 Does the Entity's AML & CIT'F EWRA cover the inherent risk components detailed below: 54 Client Yes 55 Does the Entity's AML & CIT'F EWRA cover the controls effectiveness components detailed below: 55 PProduct Yes 56 Principle of the City's AML & CIT'F EWRA been completed in the last 12 monthly Aves 56 Training and Education Yes 57 Training and Education Yes 58 Mithy provide the date when the last AML & CIT'F EWRA been completed in the last 12 monthly and the control of the control of the control of the control of the control	
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55 g Governance Yes 55 h Management Information Yes 66 Has the Entity's AML & CTF EWRA been completed in the last 12 months? 66 a If N, provide the date when the last AML & CTF	
55 h Management Information Yes 56 Has the Entity's AML & CTF EWRA been completed in the last 12 months? 56 a If N, provide the date when the last AML & CTF	
Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	
56 a If N, provide the date when the last AML & CTF	
	-
Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
57 a Client Yes	
7 b Product Yes	
57 c Channel Yes	
57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls	
effectiveness components detailed below:	
58 a Customer Due Diligence Yes 58 b Governance Yes	
58 b Governance Yes 58 c List Management Yes	
58 d Management Information Yes	

58 e	Name Screening	Ive
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in	Yes
	the last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	The Bank has no foreign branches
61	If appropriate, provide any additional information/context to the answers in this section.	
7, KYC, CI	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 30 days?	Yes
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65 65 a	Are each of the following identified:	
65 a1	Ultimate beneficial ownership Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	25%
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	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5 67 a6	Adverse Information Other (specify)	Yes
01 00		PEPs, their family and close associates, sanctions applied, suspicious activities
68	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	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4 68 a4a	Other If yes, please specify "Other"	Yes
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes
69 a 69 a1	If Y, is this at:	
	Onboarding KVC renewel	Yes
69 a2	KYC renewal	Yes

60.60	1 72	To the state of th
69 a3	Trigger event	Yes
	What is the method used by the Entity to screen for Adverse Media/Negative News?	Manual
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
73	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
13	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	No
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4 74 a5	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews Other (Please specify)	Yes
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	Prohibited
76 b	Respondent Banks	Prohibited
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Please select
76 c	Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	EDD on risk-based approach
76 e	Gambling customers	Do not have this category of customer or industry
76 f	General Trading Companies	Prohibited
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	EDD on risk-based approach
76 i	Non-account customers	EDD on risk-based approach
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	
761	Nuclear power	EDD on risk-based approach
76 m	Payment Service Providers	Do not have this category of customer or Industry
76 n	PEPs Providers	Do not have this category of customer or industry
76 o	PEP Close Associates	EDD on risk-based approach
	PEP Close Associates PEP Related	EDD on risk-based approach
76 p		EDD on risk-based approach
76 q	Precious metals and stones	EDD on risk-based approach
76 r	Red light businesses/Adult entertainment	Prohibited
76 s	Regulated charities	EDD on risk-based approach
76 t		Prohibited
76 u	44 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	EDD on risk-based approach
76 v		Prohibited
76 w		EDD on risk-based approach
76 x	Virtual Asset Service Providers	Prohibited
76 y	Other (specify)	
77	1	Arms, defense, military, gambling are the high-risk customers. Business relations with entities conducting a licensed activity without corresponding permissions / licenses are prohibited.
78	Does EDD require senior business management and/ or compliance approval?	Yes

78 a	If Y indicate who provides the approval:	I Control of the Cont
79	Does the Entity have specific procedures for	Senior business management
	onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Yes
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	The Bank has no foreign branches
82	If appropriate, provide any additional information/context to the answers in this section.	
8. MONIT	FORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	The automatically detected suspicious transactions are subject for manual investigation
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Internal System
84 b1	If "Vendor-sourced tool" or "Both" selected, what is the name of the vendor/tool?	ABC B2
84 b2	When was the tool last updated?	<1 year
84 b3	When was the automated Transaction Monitoring 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 reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
39	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
00	Occupit are representative of all the LES branches	No
00 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	The Bank has no foreign branches
)1	If appropriate, provide any additional information/context to the answers in this section.	
BAMBE	NT TRANSPARENCY	
- PA754-		
PATME	Does the Entity adhere to the Wolfsberg Group	Yes

T		
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 of Ukraine "On prevention from legalization (laundering) of ill-gotten gains, terrorist financing and financing of proliferation of weapons of mass destruction" No. 361-IX dd 06.12.2019 Resolution of the National Bank of Ukraine "On implementation of financial monitoring by the banks" No. 65 dd 19.05.2020 Resolution of the National Bank of Ukraine "On Disclosure of Information on Clients' Relationships
93 c	If N, explain	Tresonation on Clients' Relationships
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	No
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	The Bank has no foreign branches
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SAN	CTIONS	
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 Senctions Lists?	Yes
102	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?	ISPPA
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
04	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	Yes
	transactions are subject to sanctions screening?	193
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 с	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)	Used for screening customers and beneficial owners and for filtering transactional data
106 в	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	Lists of Luxembourg, France, USA, Hong Kong, UK, EU; Former Iran Sanctioned Entity World Check Data, International Sanctions Relevant Entity World Check Data, World Bank Listing of Ineligible Firms, Subsidiary owned 50% or more, or controlled by a Russian Sectoral Sanctioned company and others, lists of Ukraine
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	No
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	The Bank has no foreign branches
110	If appropriate, provide any additional information/context to the answers in this section.	
11. TRAININ	G & 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	Yes
112	Is the above mandatory training provided to:	
112 a 112 b	Board and Senior Committee Management 1st Line of Defence	Yes
112 B	2nd Line of Defence	Yes Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
112 f	Non-employed workers (contractors/consultants)	Not applicable
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	No

and the branchies that this applies to. If appropriate, provide any additional information/context to the answers in this section. Does the Entity have a program wide risk based (separate from the independent Audit sunchar)? Does the Entity have a program wide risk based (separate from the independent Audit sunchar)? 118			
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Complained Tealing process (separate from the independent Audit Muchon)? 119		Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes
Section are representative of all the LEs branches In A. Learth within questions the difference's relate to and the branchies that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If addition to inspections by the powerment information points and the branchies and the power informal audit function, a testing function or other independent third party, or both, that seesees FCC AML, CTF, ABC, Fraud and Sanctions programmed by the following: If you often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programmed by the following: It has a section to repute the programment of the party cover the following stream: If year you will be party cover the following stream: If year you will be party cover the following stream: If year you will be party cover the following stream: If year you will be party cover the following stream: If year you will be party to you will be party to you will be party your the following stream: If year you will be party you will be party you will be party your the following stream: If year you will be party you will be party you will be party your the following stream: If year you will be party you will be party you will be your young you will be party your the following stream: If year you will be party you you you you you you you you you yo		Compliance Testing process (separate from the independent Audit function)?	Yes
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section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. The Bank has no foreign branches Yes Does the Entity have policies in place addressing fraud risk? Yes Does the Entity have a dedicated team responsible	124	tracked to completion and assessed for adequacy and completeness?	Yes
and the branch/es that this applies to. The Bank has no foreign branches	125		No
information/context to the answers in this section. 4. FRAUD 127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible	125 a		The Bank has no foreign branches
Does the Entity have policies in place addressing fraud risk? Does the Entity have a dedicated team responsible	126		
Does the Entity have policies in place addressing fraud risk? Does the Entity have a dedicated team responsible	4. FRAUC		
	127	Does the Entity have policies in place addressing	Yes
	128		Yes

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.	
eclarat	tion Statement	
Volfsberg G	Group Correspondent Banking Due Diligence Questionnaire 2023 (CE	ing or equivalent position holder AND Group Money Laundering Provention Officer, Global Hood of
	AEUS BANK ICB" (Financial Instituti t to remain in full compliance with all applicable financial crime laws	on name) is fully committed to the fight against financial crime and makes s, regulations and standards in all of the Jurisdictions in which it does business and holds accounts.
he Financi		re and sustainable controls to combat financial crime in order to protect its reputation and to meet it

	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.		
ı	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.			
	[IOANNIS KYRIAKOPOULOS (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.		
I	I, LUBOV LYTOVCHAK (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDO are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.		
	JAPATHA 26,09,202 Signature & Date)		
- No. 10	4.6,09.2023 (Signature & Date)		
	PRAEUS) STE		

